

FINAL ENVIRONMENTAL
ASSESSMENT (EA)
CARBON REACTIVATION PLANT
AT
COLORADO RIVER INDIAN TRIBES
INDUSTRIAL PARK
PARKER, ARIZONA

FEBRUARY, 1991

FINDING OF NO SIGNIFICANT IMPACT

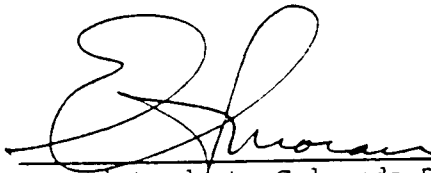
WESTATES CARBON REACTIVATION PLANT SITE 10 ACRE LEASE DEVELOPMENT PROJECT
COLORADO RIVER INDIAN RESERVATION
PARKER, ARIZONA

Based on the attached Environmental Assessment (EA) for the Westates Carbon Reactivation Plant site, for a 10 acre lease development project consisting of industrial development on Indian trust lands, which would contribute to the economic development needs of the Colorado River Indian Tribe and Indian self-determination responsibility of the BIA, I have determined that by implementation of the agency proposed action and environmental mitigation measures as specified in the EA, the proposed Westates Carbon Reactivation Plant site will have no significant impact on the quality of the human environment. In accordance with Section 102 (2) (c) of the National Environmental Policy Act of 1969, as amended, an environmental impact statement will not be required.

This determination is supported by the following findings:

1. Agency and public involvement was conducted and environmental issues related to development of Westates Carbon Reactivation Plant EA were identified. Alternative courses of action and mitigation measures were developed in response to environmental concerns and issues.
2. The EA discloses the environment consequences of the proposed action and two viable alternatives, which includes the "No Action" alternative.
3. Protective measures will be levied to protect air and water quality.
4. The proposed action is planned not to jeopardize threatened and endangered species.
5. There are no significant adverse effects on cultural resources. Should archeological remains be encountered during project ground-disturbing activities, work will stop in the area of discovery and the stipulations of 36 CFR 800.11 be followed.
6. Impacts to public health and safety are mitigated through implementation of safety measures described in the EA. Industrial wastes would be discharged into the sewer system managed by the Colorado River Sewage System Joint Venture.
7. Impacts to floodplains affected by the proposed alternative have been evaluated in accordance with E. O. 11983. No wetlands will be affected.
8. The proposed action would improve the economic and social conditions of the affected Indian community.

9. The cumulative effects to the environment are mitigated to avoid or minimize effects of implementation of the proposed project.



Superintendent, Colorado River Agency
Bureau of Indian Affairs
U. S. Department of the Interior

3-1-91
Date

FINAL ENVIRONMENTAL ASSESSMENT (EA)

WESTATES CARBON REACTIVATION PLANT
DEVELOPMENT PROJECT

COLORADO RIVER INDIAN RESERVATION
PARKER, LA PAZ COUNTY, ARIZONA

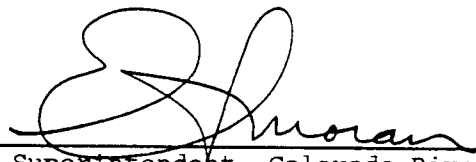
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SIMON ENVIRONMENTAL ENGINEERING INTERPRISES, INC.
FOR
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LOS ANGELES, CALIFORNIA

Prepared for:
UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS
PHOENIX AREA OFFICE
PHOENIX, AZ
AND
COLORADO RIVER AGENCY
PARKER, ARIZONA

For further information or additional comments, please contact the
Bureau of Indian Affairs, Phoenix Area Office, Environmental Quality
Services, P. O. Box 10, Phoenix, Arizona 85001 or Colorado River
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JANUARY 1991

Approved: _____


Superintendent, Colorado River Agency,
U. S. Bureau of Indian Affairs

Date 3-1-91



FINAL ENVIRONMENTAL ASSESSMENT (EA)

**CARBON REACTIVATION PLANT
AT
COLORADO RIVER INDIAN TRIBES (C.R.I.T) INDUSTRIAL PARK
PARKER, ARIZONA**

**PREPARED BY:
SIMON-EEI, INC.
FOR WESTATES CARBON, INC.
LOS ANGELES, CALIFORNIA**

**PREPARED FOR:
UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS
PHOENIX AREA OFFICE
PHOENIX, ARIZONA**

FEBRUARY, 1991



DISCLAIMER

Pursuant to the requirements of 40 CFR Section 1506.5, the Consultant declares under oath that it has no interest, financial or otherwise, in the outcome of this project.

Charles B. Simon

Assistant Secretary for President
Simon-EEI

12/11/90
Date



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CHAPTER 1

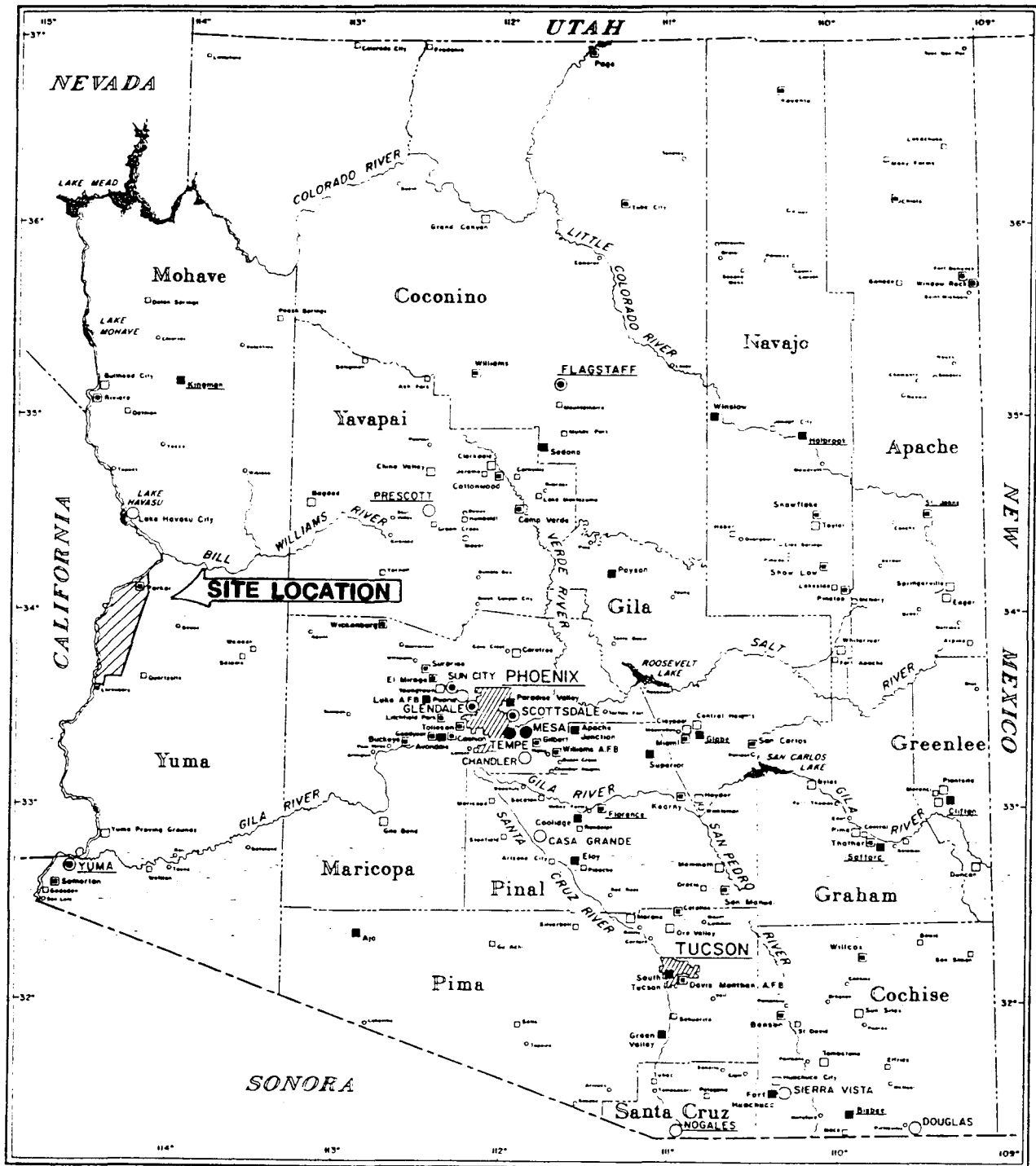
PURPOSE OR NEED FOR ACTION

The Proposed Action is the possible approval of a lease by the Bureau of Indian Affairs, which triggers the National Environmental Policy Act under the regulations at 40 CFR 1500-1508, the Department of the Interior's implementing procedures at 516 DM 1-7 and BIA's NEPA guidance at 30 BIAM Supplements 1, 2 and 3.

Westates Carbon, Inc. proposes to construct and operate a carbon reactivation plant on 10 acres of the Colorado River Indian Reservation. This EA analyzes the impacts the proposed 10-acre lease may have on any given component of the environment.

The proposed lease site (Figures 1-1, 1-2 and 1-3) is located in the Colorado River Indian Tribe (C.R.I.T.) Industrial Park adjacent to US 95 with access to I-8, I-10, and I-40. The Proposed Action, to lease 10 acres for industrial development on Indian trust lands of the Tribe, would contribute to the economic development needs of the Tribe and Indian self-determination responsibility of the BIA. The goals of the Tribal Council include the enhancement of economic development on the Reservation, an increase in Tribal revenues, and generation of employment opportunities for Tribal members. The Proposed Action would benefit the Tribe by increasing employment opportunities for tribal members and would generate lease rentals in taxes and fees for the Tribe.

The proposed lease agreement is between Westates Carbon-Arizona, Inc., a wholly owned subsidiary of Westates Carbon, Inc., and the Colorado River Indian Tribes. The primary term of the proposed lease is 20 years. Upon expiration of the primary term, the lessee shall have the option to continue the lease for a renewal term of 20 years. The lease authorizes development of the leased premises in a phased manner to accommodate potential business expansion. This EA addresses impacts associated with the



REGIONAL SITE LOCATION MAP

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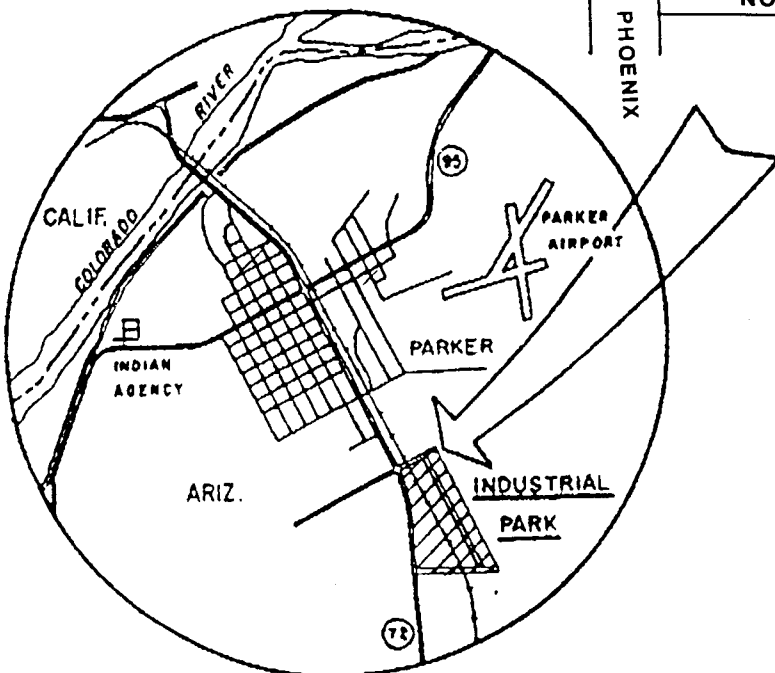
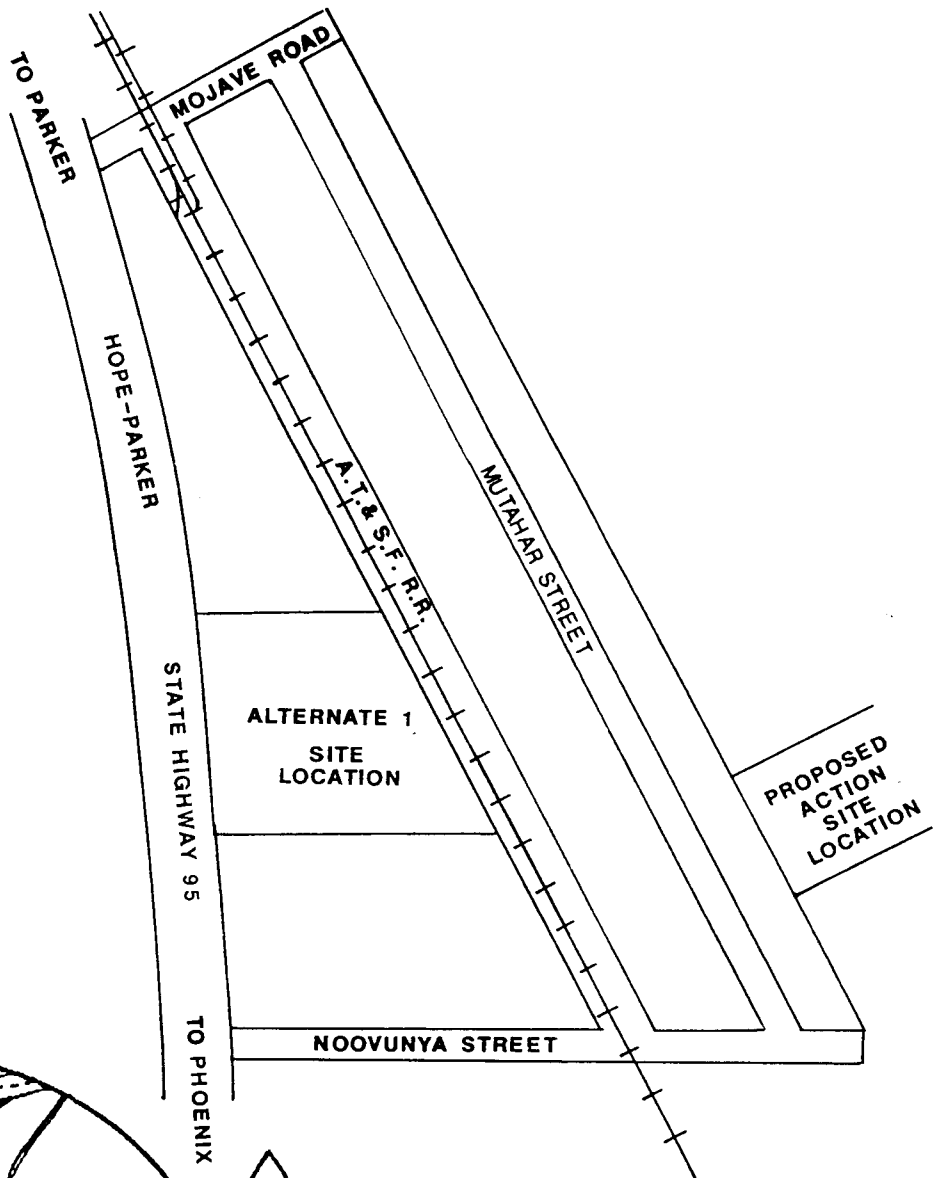
Project No.: 502-488

Figure No.:

Date: DECEMBER, 1990

1-1

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COLORADO RIVER TRIBES INDUSTRIAL PARK
Parker, Arizona

SITE LOCATION MAP

SIMON-EEI

Project No.: 502-488

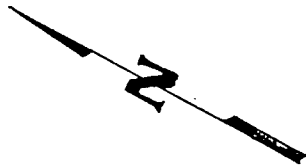
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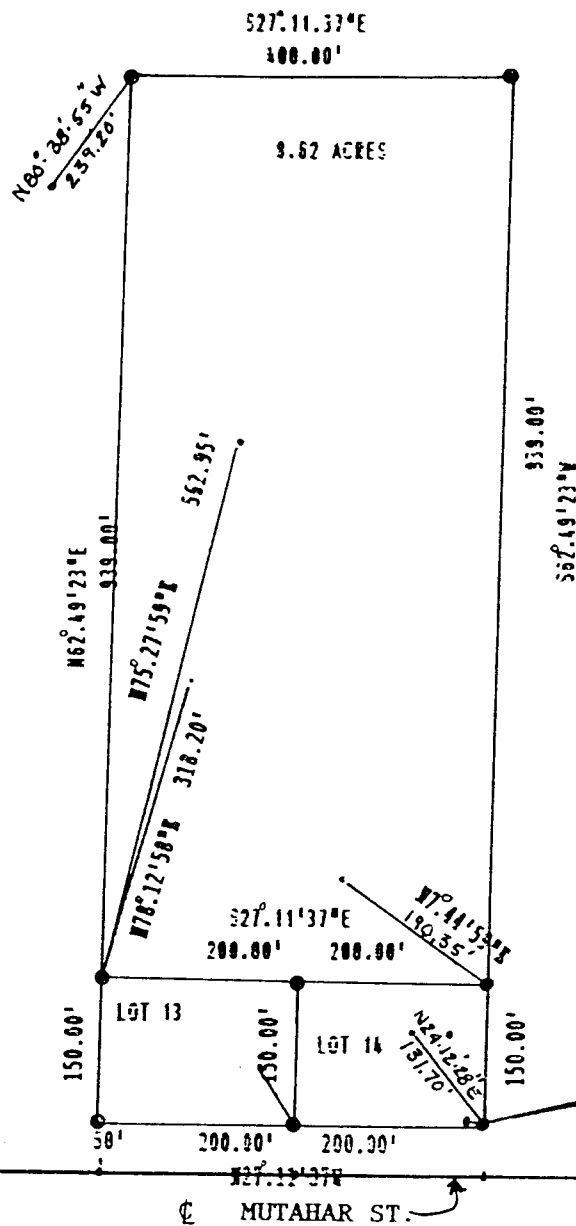
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Rebar, 1/2" Diameter
1 1/2' long, set at
all corner points.



CL MOHAVE RD 200.00' N62°49'23"E

S27°11'37"E
2815.12'



COLORADO RIVER INDUSTRIAL PARK
BEING PART OF SECTION 7, T9N, R19W
GILA, SALT RIVER BASE MERIDIAN
LA PAZ COUNTY, ARIZONA
COLORADO RIVER INDIAN RESERVATION

SCALE

100 0 100 200 300 Feet

SITE SURVEY MAP

EET ENGINEERING
ENTERPRISES, INC.

PROJECT NO: 502-488

FIGURE NO.

DATE: DECEMBER, 1990

1-3

initial phase of development only. Any future expansion of the proposed carbon reactivation plant would require further consideration by BIA.

The Secretary of the Interior, or his designee, approves the lease and the environmental assessment document, as the trust officer for the Colorado River Indian Reservation trust lands.

CHAPTER 2

PROPOSED ACTION AND ALTERNATIVES

2.A PROPOSED ACTION

2.A.1 Facility Location

The proposed carbon regeneration facility will be constructed over a one-year period at a location one-half (1/2) mile southeast of Parker, Arizona. The subject property is currently vacant land, identified as Lots 13 and 14 of C.R.I.T. Industrial Park, near Parker, Arizona.

2.A.2 Process Description

Figure 2.A.2-1 (the process flow diagram) is a graphic representation of Westates' carbon reactivation process.

2.A.2.1 Carbon Feed

The plant will process three types of spent carbon.

Type I - This carbon is also known as water carbon because of its use in aqueous systems. The amount of contaminants is typically less than 5% by weight. Contaminants may include solvents; various compounds found in gasoline such as benzene, toluene, and xylene; and cleaning fluids such as perchloroethylene. The particle size used in wet carbon is generally smaller than the type used in gaseous phase applications. Therefore, wet and dry spent carbon will be processed separately through the reactivation furnace.

Type II - Carbon is used in vapor phase applications. Type II carbon may contain 5-10% by weight contaminants, which may include paint thinner, solvent volatiles, and other indoor air pollutants.

Type III - Carbon of this type may contain 20-30% by weight of the Type I contaminants.

All contaminants from the three types of carbon will be destroyed in the reactivation process as described in Section 2.A.2.3.

2.A.2.2 Furnace Feed System

The reactivation facility will process 1,000 lbs/hr (five million lbs/year) of spent carbon. The plant will operate continuously so long as product is available to be processed.

Incoming carbon classified as hazardous waste material will be received into the regeneration process directly. Dry product will be directly transferred from shipping containers into a receiving bin and then fed to the furnace by the conveyor system. Once fed into the furnace, the 5% by weight hazardous material will be destroyed. Wet product will be unloaded as a water slurry directly into a slurry receiving tank and then gravity fed across a dewatering screen into the same furnace feed conveyor system as the dry product. Facilities that recycle hazardous waste must recycle materials without prior storage in order to be exempt from obtaining a permit as a hazardous waste storage facility (Rule 50 Federal Register 614, January 4, 1985). At this facility, hazardous waste will be unloaded from transport

vehicles and loaded directly into the process stream with no intervening storage.

The plant will reactivate nonhazardous contaminated carbon during periods when hazardous materials are not available. Nonhazardous carbon will be put in short-term storage, i.e., less than 90 days, pending processing.

2.A.2.3 Reactivation Process

Once in the furnace, the spent carbon will travel from the upper sections to the lower sections thereby exposing the carbon to heat causing it to release contaminants to the air surrounding the carbon. This causes the air to pick up all the contaminants from the carbon, leaving the carbon clean to a point that it can be re-used again. The contaminated air then enters another unit called the "Off-gas Oxidizer". The purpose of this unit is to breakdown the contaminants in such a way that they are no longer hazardous. If this unit malfunctions, safety shut-down devices will stop all processing activity to prevent the release of contaminants to the atmosphere.

2.A.2.4 Packaging

Proper sizing of cleaned, reactivated carbon is accomplished through vibrating screens. Finished product is then packaged for shipment in either drums or sacks. All steps in this process are performed under a dust control system.

2.A.2.5 Flue Gas Treatment

The furnace flue gases enter the off-gas oxidizer where the contaminants will be exposed to a temperature of approximately 1500°F. Exhausted flue gases from the off-gas oxidizer are scrubbed with alkaline water in a multi-staged system designed to remove particulates and acid gases. No heavy metals or inorganic contaminants are used or emitted.

2.A.2.6 Auxiliary Equipment (System)

The plant will have a 50-hp natural gas-fired boiler, installed to produce 1,000 lb/hr steam. It will operate continuously.

Two dust collecting systems (venturi scrubbers, VS-1 and VS-2) will be installed to collect the dust from the incoming carbon dump hoppers and conveyors, and for plant housekeeping purposes. Hazardous dust collected prior to the recycle furnace step is returned to the furnace feed system. Nonhazardous dust collected after the recycle furnace step is packaged and sold to the copper smelting industry. The dust collection systems will be inspected for leaks or improper operation by facility personnel no less frequently than once each work shift.

2.A.2.7 Protection Against Release of Contaminants

The process system contains monitoring devices to prevent an accidental release of contaminants due to malfunctions, power failures or other unforeseen events. A device in the furnace continuously monitors temperature. If the temperature in the furnace falls below the level necessary to destruct incoming

contaminants the furnace feed system is automatically shut off (within one to two seconds) preventing carbon from entering the furnace. When carbon materials are exposed to the high temperatures in the furnace the volatile organic compounds are destructed within approximately one second. This combination of nearly instantaneous destruction upon exposure to high temperature and immediate feed system shut-off if temperature falls, prevents the release of volatile organic compounds.

Devices in the multi-staged scrubber system continuously monitor pressure drop and pH of the gases exhausted from the furnace. Again, if these monitors detect readings outside prescribed levels the carbon feed system is automatically shut off. The monitors protect against the release of acid gases or particulate emissions beyond concentration limits.

The system also contains secondary continuous monitoring devices which monitor oxygen and opacity. These are backup devices to ensure that materials are properly combusted and that emissions meet standards.

2.A.2.8 Service Water

Water is stored in a tank (T-4 on Figure 2.A.2.1) for adding to the wet carbon to flush it out of the trucks into receiving tanks. Excess water falls through a screen and goes through a filter, making the water reusable. The trapped materials also go through the furnace.

2.A.2.9 Air Emission Summary

There are no process units currently in use similar to the proposed unit. Accordingly, air emission quantities have not been determined for the system. Process air emissions will be subject to the limits of the air quality standards of the Federal Clean Air Act.

A particulate emission concentration of 150 ug/m^3 is the National Primary Ambient Air Quality Standard and 50 ug/m^3 is the National Secondary Ambient Air Quality Standard (NAAQS) identified by the EPA and detailed in the Code of Federal Regulations 40 CFR Part 50. This limit means that the 24-hour average concentration of particulates will not exceed 150 ug/m^3 and also the annual arithmetic mean concentration of particulates will not exceed 50 ug/m^3 . This is analogous to saying that on a clear day, a normal person should not be able to see any dusty air coming out of the processes at this facility. (It should be noted that this statement is only an analogy and not a translation of the regulation.) A source test will be performed prior to the beginning of operations at the facility to ensure compliance with Federal emission standards. The source test will be conducted by a professional engineer and will be witnessed by facility personnel and a representative of the Tribe.

In addition to the NAAQS, the national guidelines will be used for emissions of metals, dioxins, products of incomplete combustion (PICs), particularly polycyclic organic material (POM),

and furans. These guidelines call for a minimum destruction efficiency of 99.99%.

The laboratory at the facility will review information concerning the incoming contaminated carbon as to its suitability. If contaminants are such that they cannot be destructed at the operating conditions of the facility, they will be rejected and not authorized for shipment to the facility.

2.A.3 Environmental Regulations

The proposed facility is subject to regulation by the Environmental Protection Agency and the Colorado River Indian Tribe. Federal environmental laws that the proposed facility must comply with include the Federal Clean Water Act (CWA), the Federal Clean Air Act (CAA), the Resource Conservation and Recovery Act (RCRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

2.A.3.1 Clean Water Act (CWA)

Wastewater discharges from the proposed facility will be subject to the Pretreatment Program (Section 307) requirements of the CWA. Under Section 307 EPA has adopted regulations which apply to all non-domestic discharges into publicly-owned treatment works (POTWs). These regulations prohibit the discharge of pollutants that will interfere with the treatment processes at the POTW. Westates Carbon has been notified by the POTW (The Colorado River Sewage System Joint Venture) that they

will be required to obtain an "Industrial Wastewater Discharge Permit" prior to being allowed to discharge into the sewer system (refer to letter in Appendix F).

2.A.3.2 Clean Air Act (CAA)

Air emissions from facility operations must meet the pollutant standards set by the CAA. These standards set emission limits for specific pollutants.

2.A.3.3. Resource Conservation & Recovery Act (RCRA)

A regulatory determination was received from EPA Region IX. This determination states that carbon regeneration facilities without storage are not subject to the hazardous waste treatment and permitting regulations under RCRA. (A copy of EPA's determination is included in Appendix A.) The proposed facility will not store spent carbons containing hazardous materials.

Generators and transporters of recyclable materials are subject to RCRA regulations in 40 CFR 262 and 263 and the notification requirements of RCRA. Under the RCRA generator regulations, the generator of spent carbons must properly identify and characterize these materials prior to shipment. Before transporting hazardous materials, generators must label each package according to Department of Transportation regulations in 40 CFR 172.

Carbon regeneration facilities are subject to the RCRA regulations for handling recyclable materials. These include

notification requirements under Section 3010 of RCRA and the RCRA manifest requirements.

2.A.3.4 Emergency Planning and Community Right-to-Know Act (EPCRA)

EPCRA, enacted as Title III of the Superfund Amendments and Reauthorization Act (SARA), gives the general public the right to receive information regarding the presence of chemicals in their communities. The proposed facility would be subject to the emergency planning and notification requirements of SARA Title III.

EPCRA calls on facilities that use chemical substances to determine whether they are subject to the threshold determination reporting provisions, to notify specified entities if they are, and to provide data in emergency situations as well as on a regular basis. Also, facilities must immediately notify the local emergency planning committee (EPC) and the state emergency response commission (ERC) if there is a release of a "reportable quantity" (RQ) of the listed hazardous chemicals that result in off-site exposure.

2.A.3.5 Interim Environmental Rules Under the Lease Agreement

The lease agreement provides that Westates Carbon will comply with all Federal, state and local environmental laws and regulations until such time as the C.R.I.T. adopts Reservation environmental laws. Arizona has adopted, by reference, without substantial modification, those parts of RCRA applicable to the proposed facility.

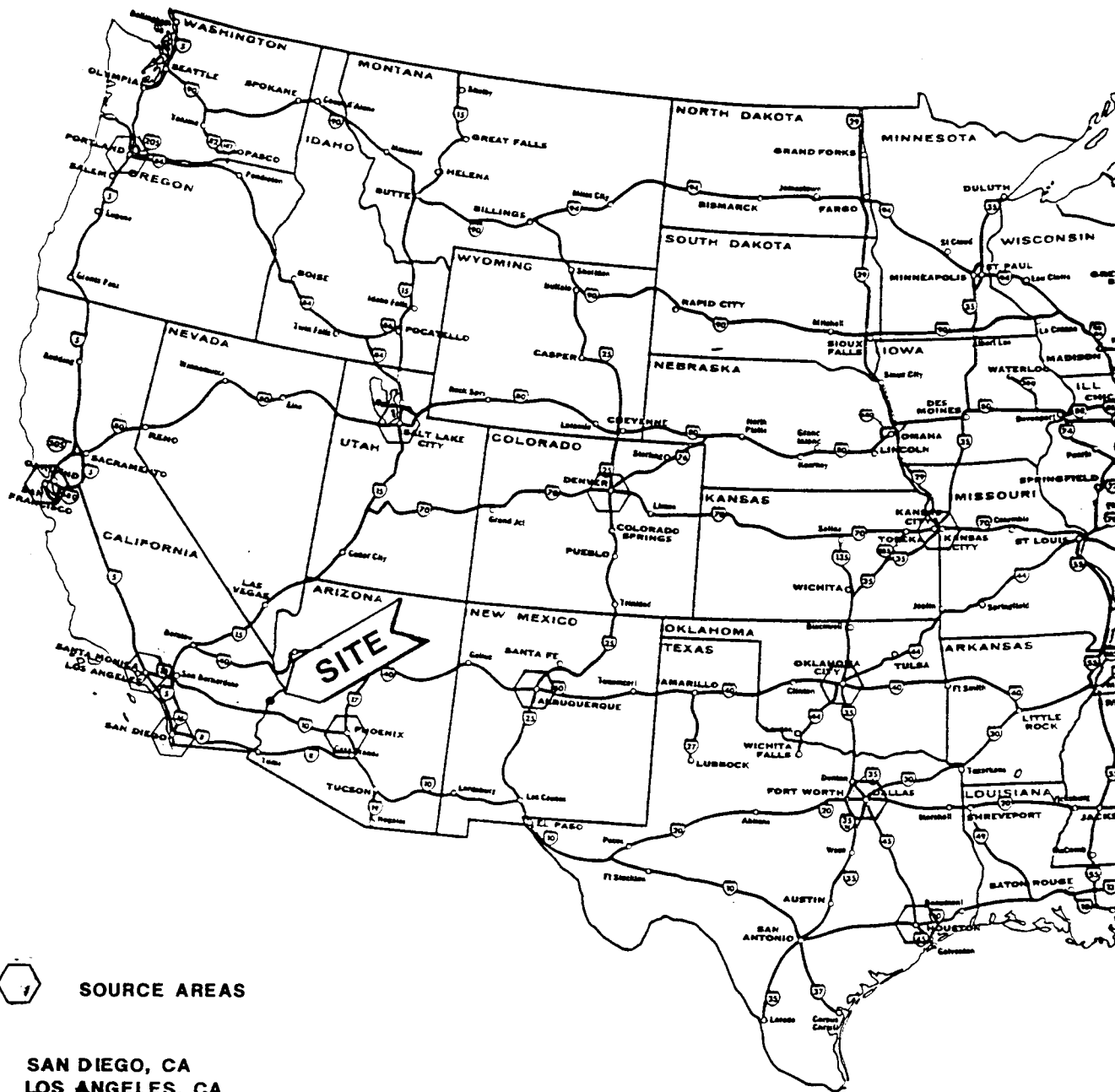
2.A.4 Transportation

Spent activated carbon will be transported to the proposed Parker facility from locations as far away as 1,500 miles. These shipments will be transported via the Federal Interstate System. These originating locations are:

- Albuquerque, NM
- Dallas, TX
- Denver, CO
- Houston, TX
- Kansas City, KS
- Los Angeles, CA
- Oklahoma City, OK
- Phoenix, AZ
- Portland, OR
- Salt Lake City, Utah
- San Diego, CA
- San Francisco, CA

Points of origin and primary transportation routes for incoming carbon are shown on Figure 2-1, Page 2-12.

Spent carbon material enroute to the facility will be transported in containers which conform to the Department of Transportation requirements detailed in 49 CFR 178, SHIPPING CONTAINER SPECIFICATIONS. CFR 178 prescribes the manufacturing and testing specifications for packaging and containers used for the transportation of hazardous materials in commerce. Trucks transporting hazardous spent carbon materials must also conform to the federal rules listed in 40 CFR 263, STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE. These standards require proper manifesting, recordkeeping, licensing, insurance, driver training, and emergency preparedness. Enforcement of these rules is under the jurisdiction of the Highway Patrol officers at the various state ports of entry and at other random check points.



SOURCE AREAS

SAN DIEGO, CA
 LOS ANGELES, CA
 SAN FRANCISCO, CA
 HOUSTON, TX
 DALLAS, TX
 KANSAS CITY, KS
 ALBUQUERQUE, NM
 OKLAHOMA CITY, OK
 DENVER, CO
 PHOENIX, AZ
 SALT LAKE CITY, UT
 PORTLAND, OR

TRANSPORTATION ROUTES & SOURCE AREAS FOR SPENT ACTIVATED CARBON

SIMON-EE

Project No.: 502-488

Figure No.:

Date: JANUARY, 1991

2-1

Enforcement of same on the Reservation is under the jurisdiction of Tribal Police.

Unloading operations will be monitored by facility personnel. A total of up to six truck loads of spent carbon per week are expected to arrive at the new facility. On an average less than two of these truck loads would be classified as hazardous waste material. The balance of the truck loads received will be non-hazardous spent carbon.

2.B ALTERNATIVES TO PROPOSED ACTION

2.B.1 Alternative 1

This alternative differs from the Proposed Action in that the very same type of facility with identical functions would be sited at a different location in the C.R.I.T. Industrial Park. The alternative location is described as lot B on the C.R.I.T. Industrial Park plot. This is a 12.0-acre parcel situated as shown in Figure 1-3.

2.B.2 Alternative 2

This alternative differs from the Proposed Action in that process wastewater from the same type of facility as the Proposed Action will be discharged to an on-site evaporation pond instead of being discharged to the Colorado River Sewage Joint Venture (CRSSJV) system.

An evaporation pond with an estimated surface area of 3.06 acres would be required to evaporate the annual facility discharge of 6.83 million gallons per year. A pond measuring 365 feet by 365 feet would provide the necessary 3.06 acres of surface area. Either of the proposed facility locations, the Proposed Action or Alternative 1, could accommodate a 365-foot square pond.

The pond would be double-lined with a 60 mil (0.060 inch) thick high density polyethylene plastic liner to prevent salt or carbon fines from leaching to the groundwater. It is estimated the rate of accumulation of salt and carbon solids in the pond would be approximately 6200 cubic feet per year. This equates to approximately 0.6 inches per year of fillup in a 3.06-acre pond three feet deep with side slopes of three feet horizontal to one foot vertical. At the end of 20 years, the pond would have approximately one foot of sediment in the bottom.

At closing of the facility or at such time as the pond is no longer needed, the accumulated sediment could be disposed of at a permitted landfill.

2.B.3 No-Action Alternative

NEPA regulations state that a No Action Alternative shall be considered. The No Action Alternative has been interpreted to mean that the lease would not be approved and that the proposed project would not be constructed. This alternative would result in the continued availability of the proposed lease site for other development.

CHAPTER 3

DESCRIPTION OF AFFECTED ENVIRONMENT

This chapter describes the existing environment at the location of the proposed facility. Included is information on land features, geologic setting, soils, water resources, and air quality. The living resources described include wildlife, vegetation, ecosystems and adjacent agricultural resources. The available cultural, historic and archeological information for the site is also discussed.

3.A PHYSICAL ENVIRONMENT

3.A.1 Climate

The climate is typical of the Sonoran Desert Region. Winters are mild with minimum temperatures above freezing. Table 3.A.1-1 gives data on temperature and precipitation for the assessment area recorded at Parker, Arizona, for the period 1951-80. The summers are long, hot, and dry with temperatures commonly exceeding 100°F. Average total precipitation is approximately 3.82 inches per year. Precipitation is sporadic, occurring mainly in the time intervals of July - September and December - February. The evaporation rate in this area is 86 inches per year.

3.A.2 Air

3.A.2.1 Quality

Data from the Yuma, Arizona air quality monitoring station was collected. Yuma, Arizona is about 100 miles south-southwest of Parker. The data from the Yuma air quality

Table 3.A.1-1: Summary of Climate Information for Study Area

Weather Month	Average Temperature (°F)		Average Total Precipitation (Inches)
	Daily Max	Daily Min	
January	67.3	37.1	0.53
February	72.9	41.7	0.32
March	78.7	46.6	0.52
April	87.0	53.6	0.22
May	95.3	61.9	0.03
June	103.3	69.6	0.01
July	108.6	78.8	0.30
August	106.7	78.2	0.56
September	102.5	70.2	0.26
October	91.4	57.8	0.29
November	77.5	44.9	0.32
December	68.3	38.1	0.46
Year	88.3	56.5	3.82

Average Total Snow, Sleet and Hail Annually: Trace
(Based on a thirty year average)

From Parker Community Profile, Parker Chamber of Commerce

monitoring station is representative of the air quality at Parker, Arizona. The Yuma District air quality generally meets or exceeds the National Ambient Air Quality Standards. There are only two air quality monitoring sites (both in downtown Yuma), so the data for the district is limited and based on local observations.

3.A.2.2 Noise

Noise is generally defined as any unwanted sound. Noise is commonly measured in terms of a dimensionless unit called the decibel (dB). One dB is equal to approximately the smallest degree of difference of loudness of sounds ordinarily detectable by the human ear whose range is from about 1 dB for the faintest audible sound to 130 dB.

Noise level measurements are frequently adjusted to account for the human ears variable sensitivity to different sound frequencies. The term "dB(A)" applies to sound level measurements that have been adjusted to account for this sensitivity.

The background noise levels in the vicinity of the facility can annually average 65 to 69 dB(A) due to truck traffic or nearby Highway 95. Highway 95 is approximately 1400 feet west of the site.

Noise levels resulting from operation of various heavy equipment during facility construction, assuming near continuous

operation of the equipment, would be expected to average 80 dB(A) at a distance of 50 feet.

Office workers in a building across the street from the proposed facility would be the individuals most exposed to the construction noise. Allowing for sound level attenuation due to distance, these office workers would be exposed to construction noise levels of from 60 to 70 dB(A). These exposure levels would be equivalent to the background noise levels from the highway.

Noise from vehicular use on access roads would occur during operations at the facility. Access to the proposed facility would be via Mojave Road located 1/2-mile northwest and Mutahar Street, which runs adjacent to the site. Approximately six tractor-trailer trucks per week will arrive and unload at the proposed facility during normal operations. There would also be vehicular noise from facility employees arriving and leaving work. Noise levels from tractor-trailer trucks and employee vehicles would not be expected to exceed 50 dB(A) at 100 feet.

3.A.3 Water

3.A.3.1 Groundwater

Groundwater in the Parker area occurs as both confined and unconfined aquifers. Most of the wells are completed in the Colorado River gravels (alluvium), where unconfined or water table conditions prevail. The Miocene(?) Fanglomerate (gravel deposits at base of mountains) and the lower part of the Bouse Formation contain confined aquifers (artesian). The (?) signifies the geological age is not certain. The city wells in

Parker obtain most of their water from the Miocene(?) Fanglomerate. Sources of recharge to the groundwater supply of the area are the Colorado River, precipitation, and underflow from areas bordering the Parker Valley.

In this area, a large amount of the groundwater is lost through evapotranspiration in the Parker area, (Figure 3.A.3.1-1). Direct recharge from precipitation is limited. Loss of water from the Colorado River provides almost 50% of the recharge to the groundwater near Parker (Figure 3.A.3.1-1).

The groundwater level near Parker is approximately 350 feet (Figure 3.A.3.1-1). The depth to water in the areas bordering the flood plain ranges from 70 to 300 feet below the land surface.

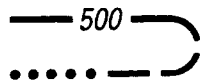
The production from wells screened in the Colorado River alluvium comes from highly permeable beds of sand and gravel. The Colorado River gravel has the highest transmissivity of the water-bearing sediments in the area. Wells which penetrate sufficient thicknesses of the gravel may produce more than 100 gpm per foot of drawdown (specific capacity).

3.A.3.2 Water Quality

The chemical quality of the groundwater in the Parker project area is generally related to the source and movement of the water. The chemical quality of the groundwater is influenced by evaporation, transpiration by native vegetation, former flooding of the river, irrigation developments, and to a marked



EXPLANATION



WATER-LEVEL CONTOUR—Shows altitude of the water level prior to development. Dashed where based on meager data; dotted where approximately located. Contour interval, in feet, is variable. National Geodetic Vertical Datum of 1929



SELECTED WELL—Number, 1680, is water-level altitude measured prior to extensive development



GROUND-WATER DIVIDE—Open circles where approximately located



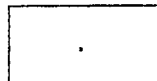
1,000-5,000



Less than 1,000



BASIN-FILL DEPOSITS



BEDROCK OF THE MOUNTAINS

**LEGEND TO PREDEVELOPMENT
HYDROLOGIC CONDITIONS IN THE
PARKER VALLEY PROJECT AREA**

Sheet 2 of 3

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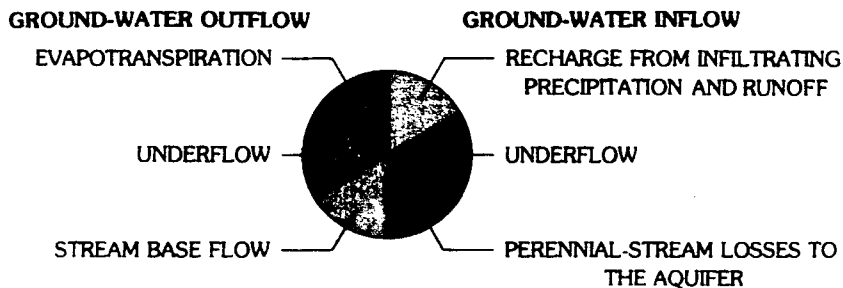
PROJECT NO.: 502-488

FIGURE NO.

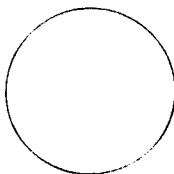
DATE: DECEMBER, 1990

3.A.3.1-1

GROUND-WATER BUDGET



RELATIVE MAGNITUDE OF OUTFLOW AND INFLOW—In acre-feet per year



More than 100,000



Less than 5,000

$\frac{4}{11,000}$

RATIO OF ANNUAL INFLOW TO TOTAL VOLUME STORED IN THE GROUND-WATER SYSTEM—Upper number, 4, is the estimated average inflow and outflow to the aquifer of the basin, in thousands of acre-feet. Lower number, 11,000, is the estimated recoverable ground water in the basin-fill material to a depth of 1,200 feet below land surface, in thousands of acre-feet, rounded to the nearest million acre-feet

PERENNIAL STREAM

BOUNDARY OF GROUND-WATER BASIN

LEGEND TO PREDEVELOPMENT
HYDROLOGIC CONDITIONS IN THE
PARKER VALLEY PROJECT AREA

Sheet 3 of 3

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FIGURE NO.

DATE: DECEMBER, 1990

3.A.3.1-1

Table 3.A.3.2-1

Chemical analyses of water from wells from the principal gravel zone underlying the flood plain, Parker-Blythe-Cibola area, Arizona and California

(Analyses are in milligrams per liter, except as indicated)

Water temperature: Temperature, in degrees Celsius ($^{\circ}\text{C}$). Temperatures taken with Fahrenheit thermometer.

Geologic sources: YA, younger alluvium; YAs, younger alluvium, sand; YAW, younger alluvium, wash deposits; YAg, younger alluvium, basal gravel; OA, older alluviums; B, Bouse Formation; F, fanglomerate.

Use of water: Irr, irrigation; PS, public supply; Dom, domestic; Ind, industrial or mining; T, test hole or well; Un, unused; S, stock.

Remarks: Analyses by following laboratories A, U.S. Geological Survey, Albuquerque, NM; T, U.S. Geological Survey, Tucson, Ariz.; U, U.S. Geological Survey, Washington, D.C.; Ariz, State of Ariz; Calif, State of California; Y, U.S. Geological Survey, Yuma, Ariz.; P, private.

Well	Date Sampled	Perforated interval (feet below land-surface datum)	Temperature (°C)	Geologic source	Use	Silica (SiO ₂)	Calcium (Ca)	Magnesium (Mg)	Sodium (Na)	Potassium (K)	Bicarbonate (HCO ₃)	Sulfate (SO ₄)	Chloride (Cl)	Fluoride (F)	Nitrate (NO ₃)	Dissolved solids (sum)	Hardness as CaCO ₃		Specific conductance (micro-mhos at 25°C)		pH	Percent sodium	Remarks
																	Calcium, magnesium	Non-carbonate					
Parker Valley Arizona																							
(8-9-20) 11dbc	6-14-63	28-118	21	YAs, YAg	Un...	18	115	39		137		222	391	110	.6	.1	919	446	264	1,390	7.55	--	A, Boron-0.14
14cdd	6-17-63	50-138	23	YAs, YAg	Un...	28	88	23		285		308	472	136	.9	.2	1,180	316	64	1,770	7.80	66	A, Boron-0.30
14dab	2-15-63	52-53	22	YAs	T....	33	84	59		155		280	392	107	1.3	--	971	454	224	1,410	7.80	43	Y
14Z1	1930(?)	--	--	YAs	Dom..	--	105	34		181		256	360	144	3.2	--	954	402	192	--	--	50	Ariz
20cbd	8-15-63	--	24	YAg	Dom, S	22	134	31		158		224	438	117	.4	--	1,010	462	278	1,400	7.70	34	Y
24cba	2-13-63	63-64	23	YAs	T....	25	115	22		259		146	512	200	1.6	--	1,210	376	256	1,820	7.60	60	Y
	2-13-63	86-87	24	YAg(?)	26	110	23		220		149	412	208	1.6	--	1,080	370	248	1,750	7.75	56	Y
25cae	2-15-63	84-85	23	YAg	T....	28	51	11		136		123	183	121	1.9	--	594	172	71	971	7.50	63	Y
36aba	3-5-63	62-63	26	--	T....	29	41	13		173		117	183	167	3.5	--	668	155	59	1,150	7.75	71	Y

degree, by the local geology. The groundwater beneath the flood plain is relatively poor in quality, except where irrigation water has entered the aquifer. The shallow groundwater in the nonirrigated part of the valley has twice the mineral content as the Colorado River water.

An explanation for the water composition of many of the wells can be understood by assuming that the groundwater originated as infiltration from the Colorado River associated with irrigation canals, field irrigation, or the river channel. The water composition has been changed by evaporation and concentration.

The results of chemical analyses of water from wells in T.9N.R.20W, near Parker, Arizona show the change (Table 3.A.3.2-1). The chloride concentrations for these wells varies between 107 and 208 mg/liter. It is assumed the dissolved minerals now in the ground water must have come from the Colorado River.

3.A.4 Geology

3.A.4.1 Regional Physiography

The area has a hot, arid climate and is characterized by roughly parallel mountain ranges separated by alluvial basins. The elevation of the basins varies between sea level and 1000 feet. The Colorado River is the major stream in the area. The Colorado River flood plain is between three and nine miles wide. It is less than one mile wide near Parker, and increases to nine

miles in the Parker Valley. The flood plain is that part of the Colorado River Valley that has been covered by floods of the Colorado River, prior to construction of Hoover Dam. The elevation of the flood plain near Parker is approximately 360 feet above sea level. The mountains are rugged and rise abruptly from the Colorado River or from alluvial slopes. The highest mountain summits in the region reach an average elevation of around 3300 feet. Between the flood plain and the mountains are piedmont slopes, which are dissected by washes from the mountains and, in a few exceptions, into adjacent and topographically distinct basins. The proposed facility will be located on relatively flat terrain (slopes 0-3 percent).

3.A.4.2 Geology

The geologic units considered important to water resources development at the location of the proposed Westates Carbon plant site are the Miocene(?) Fanglomerate, the Bouse Formation and the alluvium of the Colorado River and its tributaries.

The rocks of the mountains are relatively impermeable, and form the boundaries of the groundwater reservoirs. Interbasin water movement is limited by the impermeable bedrock and limited to groundwater movement in surface sediments, where intermittent surface drainage exits from a basin.

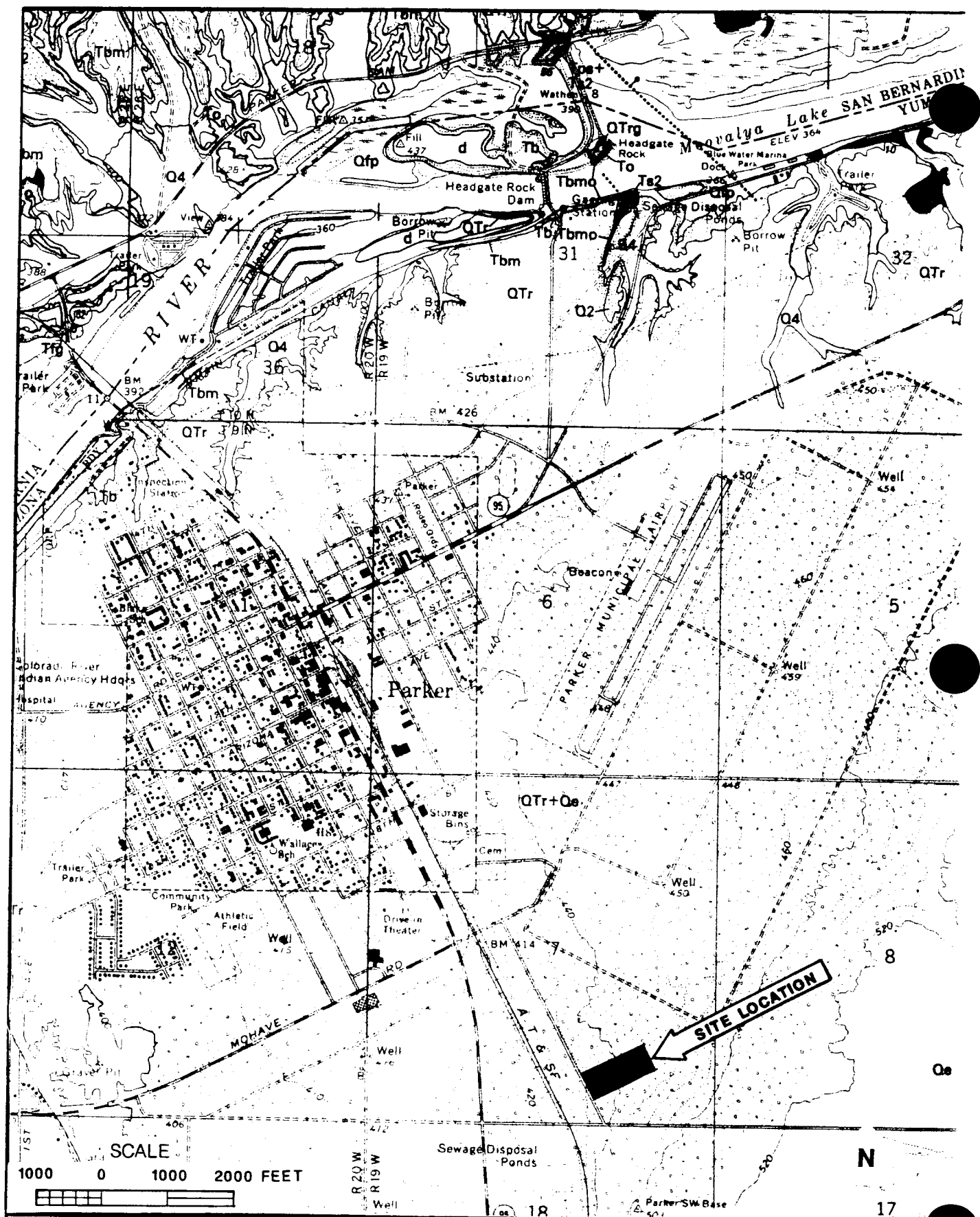
The bedrock includes all rocks older than the Miocene(?) Fanglomerate, and contains sedimentary, metamorphic, and igneous rocks. These Miocene beds are gravel deposits that have eroded from the mountains and filled the basins. The thickness of these

beds varies widely across the basins. The Fanglomerate is a potentially important aquifer as near Parker, where wells with a yield of 15 gallons per minute per foot of drawdown have been developed in the Fanglomerate, (Metzger, et al, 1973).

Figure 3.A.4.2-1 is a geologic map which identifies the exposed rocks in the Parker area and at the proposed Westates plant site. Sediments identified on the geologic map at the site location are Qe (Eolian Deposits, Holocene) and QTr (Old Fluvial Deposits). Samples taken at the site indicated that only the eolian windblown sand and silt (Qe) are present. The eolian sand is tan to light tan and fine to medium grained, occurring as a deposit on the surface throughout the area.

3.A.4.3 Soils

The descriptions and delineations of soils for the Colorado River Indian Reservation Soil Survey do not always correlate with those of adjacent soil survey maps. The differences are related to differences in mapping intensity, extent of soils within the survey, change in knowledge about soils, and modifications in soil classification. The soil map shows that the soil present at the site is classified as Superstition series, which is a gravelly loamy fine sand that develops on zero to three percent slopes. Samples collected at the site show the same type of material. Chemical analyses of the soil samples revealed no evidence of any existing site contamination. Vegetation supported by Superstition soils is white bursage, creosotebush, turkshead and big gulleeta.



**GEOLOGIC MAP OF THE
PROJECT AREA**
From U.S.G.S. Map I-1124

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PROJECT NO: 502-488

FIGURE NO.

DATE: DECEMBER, 1990

3.A.4.2-1

- d** DISTURBED GROUND—Ground disturbed by man for agriculture, urban development, gravel pits, and so forth
- Q4** ALLUVIAL DEPOSITS (HOLOCENE, PLEISTOCENE AND PLIOCENE)
Recent alluvium (Holocene)—Silt, sand, pebbles, cobbles, and boulders in modern drainage areas. Consists of poorly sorted, angular to subrounded, unconsolidated material of local origin. Age estimated at 0–2,000 years. Thickness generally less than 2 m
- Q2** Intermediate alluvium, undivided (Pleistocene)—Mapped where subdivision of unit is impractical
- Qe** EOLIAN DEPOSITS (HOLOCENE)—Windblown sand and silt. Reworked largely from Colorado River deposits (QTr) and Bouse Formation (Tb). As much as 5 m thick
- Qfp** COLORADO RIVER DEPOSITS
Floodplain deposits (Holocene)—Unconsolidated, mostly sand, silt, and clay deposited at flood stage of the Colorado River. Predates construction of dams to control riverflow. Thickness 0–60 m
- QTr** Old fluvial deposits (Pleistocene and Pliocene)—Moderately to poorly indurated clay, silt, sand, pebbles, cobbles, and marl deposited by the Colorado River. Colors are predominantly shades of red and brown. A thin limestone intercalated in the river deposits south of the Mesquite Mountains (see index map) contains unidentified ostracods, and a plant fossil tentatively identified as *Chara homemannii* Wallman by V. W. Proctor (written commun., 1975). Fossil wood is present in sand deposits south of the Mesquite Mountains. Fine-grained deposits near the Mesquite Mountains have normal paleomagnetic polarity, indicating an age younger than 700,000 years (Kukla, 1975). Terraces at different levels exhibit different degrees of soil formation, indicating a wide range of ages. Some deposits channel into underlying units To, Tb, or other river deposits. Thickness as much as 70 m. A terrace associated with these deposits occurs at an altitude of about 480 feet (144 m) on the west side of the Colorado River
- QTrg** Old fluvial gravel (Pleistocene and Pliocene)—Well-sorted pebbles and some cobbles of a variety of durable rocks, such as quartzite, chert, and so forth, which have been transported a considerable distance. Individual stones are well rounded, polished, and on the exposed surface of the deposit are coated with desert varnish. Thickness as much as several meters
- Tb** BOUSE FORMATION (PLIOCENE)—Pink, tan, and pale-grayish-green calcareous clay, silt, sand, and marl, moderately to poorly indurated, well bedded. Locally contains foraminifera, gastropods, and other fossils of brackish marine environment (Metzger, 1968). Clay commonly contains minor montmorillonite. Thickness 0–90 m. Except for a few places near the hills, where dips are as much as 10°, formation is nearly flat lying
- Tbm** Marl—Light-gray to white marl and limestone at the base of the formation. Typically contains more than 95 percent CaCO₃. Traces of bleached biotite, feldspar, and quartz. Thickness 1 m or less
- Tfg** FLUVIAL GRAVEL (PLIOCENE)—Well-sorted pebbles, gravel, and sand; crossbedded, poorly indurated, light gray to yellow brown, iron stained. Underlies Bouse Formation at Earp, Calif., and at several other small unmapped outcrops along the Colorado River between Parker and Headgate Rock dam. Thickness 0–3 m
- To** FANGLOMERATE OF OSBORNE WASH (PLIOCENE AND MIOCENE)—Poorly sorted, locally well bedded, mostly subangular, generally well indurated sand, pebbles, and cobbles of local origin. Clasts are predominantly volcanic and sedimentary rocks of Tertiary age. Color is dark reddish brown to gray. Some of what is mapped as To may be equivalent in age to Bouse Formation (Tb) or the oldest part of old alluvium (QT1a). To is generally separable from these units on the basis of its better induration and higher content of volcanic rocks. Thickness 0–60 m. In the NW¼NW¼ sec. 25, T. 2 N., R. 24 E., unit contains a volcanic ash bed as much as a meter thick that is similar but probably not the same as one found in sand of the Bouse Formation (Tbs). Named from exposures along Osborne Wash, a major drainage which joins the Colorado River immediately east of the quadrangle boundary at a point about 5 km NE of Parker
- Ts** SEDIMENTARY ROCKS, UNIT 3 (MIOCENE)—Tan to reddish-brown and pink sandstone, siltstone, sedimentary breccia, conglomerate, and a few thin beds of limestone, generally thin bedded and variably indurated. In western part of map area consists almost entirely of well-indurated conglomerate and sedimentary breccia. Conglomeratic beds contain rare clasts of Peach Springs Tuff (Tps) of Young and Brennan (1974); breccia clasts are largely sandstone and limestone, probably derived largely from sedimentary rocks, unit 2 (Ts2). Includes a few small flows of andesite (Ta). Thickness 0–700 m

LEGEND TO GEOLOGIC MAP OF THE PROJECT AREA

Sheet 2 of 2

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PROJECT NO: 502-488

FIGURE NO.

DATE: DECEMBER, 1990

3.A.4.2-1

3.A.4.4 Land Use

About 45 percent of the C.R.I.T. Reservation is used for irrigated farming. Most of the remainder of the Reservation is rangeland used for seasonal livestock grazing. The C.R.I.T. Industrial Park comprises approximately 1140 acres set aside for commercial and light industrial use.

3.A.5 Other

3.A.5.1 Transportation Network

Access to the proposed site is via Mutahar Street. The site is approximately 1/4 mile east of Arizona State Highway 95 (Figure 1-2). State Highway 95 intersects the town of Parker, Arizona one-half mile to the north of the proposed site. Highway 95 connects to U.S. Interstate 10 approximately 35 miles south of the proposed site. Interstate 10 heads east through Phoenix Arizona and west through Blythe, California to Los Angeles. State Highway 95 connects to U.S. Interstate 40 approximately 42 miles north of Parker. Interstate 40 heads east through Flagstaff, Arizona and Gallup, New Mexico and heads west through Barstons, California to Los Angeles. Various rural roads in the vicinity of the proposed site service agricultural areas.

Additional regional transportation networks include airports, railroad and bus lines. The nearest airport to the proposed site is the Avi-Suquilla Airport in Parker. The Atchison, Topeka and Santa Fe Railroad runs north through Parker and is a major transporter. The Sun Valley Bus Lines services Parker and the surrounding area.

3.B BIOLOGICAL ENVIRONMENT

3.B.1 Desert Flora

Terrestrial vegetation at the facility site is associated with the desert scrub community of the Gila Desert. Creosotebush and burrobrush are the predominant plant communities. Other native plants living in the area include desert trumpet, snakeweed, scorpion weed, lupine and brittle bush. Vegetation is sparse in most areas. A detailed list of plant species likely to be found within the study area is presented in Appendix B.

3.B.2 Desert Fauna

Songbirds, small mammals, amphibians and reptiles are common in the Gila Desert Cactus Plain at the Parker site. A detailed list of animal species likely to be found within the study area is presented in Appendix B.

3.B.3 Unique Biological Resources

3.B.3.1 Unique Ecosystems

A unique community is one which possesses attributes of special academic interest and environmental concern. The cactus plains dune ecosystem is located approximately one-half mile east of the proposed plant site. The dunes provide a natural habitat to the Mohave fringe-toed lizard (*Uma Scoparia*) which is a candidate species on the Arizona Threatened Native Wildlife List. This species is threatened due to general loss of the dune habitat. The proposed plant site location is in the flat cactus plain area outside of the dune area.

3.B.3.2 Endangered Species

Under the authority of Section 12 of the Endangered Species Act of 1973 (Public Law 93-205, 87 Stat. 884), the federal government has placed 30 native and one foreign plant species from Arizona on the U.S. Endangered and Threatened Species List. The listing of such plants was published in the Federal Register between October 2 and November 7, 1979. After the site visit and survey of March, 1990, it was determined that no listed endangered plants or animals are found at the proposed plant site (see Appendix C for supporting regulatory documentation).

3.C SOCIOECONOMIC AND SOCIOCULTURAL ENVIRONMENT

3.C.1 Parker, Arizona

The economy of Parker is based primarily on retail trade and services associated with the recreational facilities along the Colorado River near Headgate Rock Dam. Parker also serves as a trade center for the Colorado River Indian Reservation and small communities along the Colorado River. Agriculture is one of the major economic bases for Parker. Water from the Colorado River is used to irrigate approximately 84,500 acres of land in the Colorado River Indian Reservation. The fertile fields yield crops of melons, cotton, wheat, barley, alfalfa and lettuce.

The unemployment rate in 1988 for Parker, Arizona, and La Paz County, Arizona, was 5.3 percent and 8.5 percent, respectively. According to the U.S. Bureau of Census, Parker had a population of 3,035 in 1988. The population in the town grew during 1980-1988 at an annual rate of 2.2 percent compared with

3.4 percent for the State of Arizona. A comprehensive community profile of Parker, developed by the Arizona Office of Economic Planning and Development, is included in Appendix D.

3.C.2 Colorado River Indian Reservation

The Colorado River Indian Reservation covers a total area of 268,691 acres in parts of southwestern Arizona and southeastern California. Parker is the largest town on the Reservation. Other communities on the Reservation include Big River, California, and Poston, Arizona. Indians of the Mohave, Chemehuevi, Navajo, and Hopi tribes live on homesites scattered throughout the Reservation area. Agriculture is the main reservation industry and income for area Indians is derived from the local tourist industry associated with Colorado River recreational facilities. Other income is derived from various federal, state and tribal agencies providing local services to the reservation. The population of the reservation was 2411 in 1988. Unemployment at the same time was 49%. The Reservation employment structure and labor force are shown below.

COLORADO RIVER INDIAN RESERVATION EMPLOYMENT STRUCTURE

	<u>Percent of Total</u>
Agriculture	14.4%
Commercial-Industrial	1.4
Outdoor Recreation	1.6
Government Employment	73.3
Off-Reservation Employment	9.3

Source: Colorado River Indian Tribe Planning Department

LABOR FORCE DATA

	<u>1980</u>	<u>1987</u>	<u>1989</u>
Civilian Labor Force	609	1,079	1,175
Employed	406	615	596
Unemployed	321	464	579
Unemployment Rate	33.3%	43%	49%

Source: Bureau of Indian Affairs, Information Profiles,
Colorado River Indian Tribe 1989, Preliminary.

A detailed community profile of the Colorado River Indian Reservation is included in Appendix D.

3.D HISTORIC AND ARCHEOLOGICAL FEATURES

The proposed plant site is located on native desert land. A small amount of surface refuse and a great number of recreational vehicle tracks have impacted the surface environment. The C.R.I.T. Museum completed an archeologic walk-over for the site on August 8, 1989, and indicated that no archeological or cultural sites were identified (see Appendix E). The results have been communicated to the Arizona State Historic Preservation Officer.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

This chapter describes the potential environmental impacts of the Proposed Action and alternative actions. Included is information on construction and operational phase impacts on the air and water environments, species and ecosystems, socio-economic and cultural factors, and unique features (archeological and historical).

Table 4-1, at the end of Chapter 4, shows a summary of the environmental impacts for the Proposed Action and three alternatives. This table may be referred to during the following discussion.

4.A IMPACTS ON THE PHYSICAL ENVIRONMENT

4.A.1 Climate

The Proposed Action and Alternatives 1 and 2 will have no effect on the general climate of the area.

4.A.2 Air

4.A.2.1 Quality

Proposed Action and Alternatives 1 and 2. The air quality at the site location will be temporarily affected by dust during the construction phase of the project. No residential areas are adjacent to the site. These impacts are not expected to be significant.

Air emissions from the proposed facility will be required to be less than the Federal Significant Pollutant Emission rates in 40 CFR 52-21(b)(23)(i)-(iii). Facility emissions are not expected to have a significant impact on ambient air quality.

No Action Alternative. Selection of the No Action Alternative would result in no impacts to existing air quality.

4.A.2.2 Noise

Proposed Action and Alternative 2. The Proposed Action and Alternative 2 would contribute to direct and indirect noise level effects as well as short-term and long-term noise level effects. Direct construction noise levels would impact neighboring properties. These impacts are not considered significant in that the expected construction noise levels would be comparable to background levels due to truck traffic on nearby Highway 95.

Noise impacts from tractor-trailer trucks during operations at the facility are not expected to be significant. These noise levels would be less than background levels.

Alternative 1. Noise level impacts under Alternative 1 would not be significant during construction or facility operations. The Alternative 1 site location is situated immediately adjacent to Highway 95. Accordingly, background noise levels from vehicular traffic would be higher than those experienced at the Proposed Action site location.

No Action Alternative. Selection of the No Action Alternative would result in no additional noise over existing background levels.

4.A.3 Water Resources

4.A.3.1 Water Sources (Surface and Groundwater)

Proposed Action and Alternatives 1 and 2. Water usage at the proposed facility is estimated at 100 gallons per minute, which equals 52.56 million gallons per year or 161.2 acre-feet per year.

Under terms of the lease agreement water will be supplied by the C.R.I.T. The lease also provides that Westates will install water filtering equipment on the tribal water system in order to provide adequate filtering capacity for water usage at the facility. Water usage of the proposed facility equals 0.022 percent of the Tribe's annual water supply of 717,000 acre-feet. This usage would not constitute a significant reduction of the Tribe's water supply.

No Action Alternative. Selection of the No Action Alternative would result in no additional water use over that which is currently being used.

4.A.3.2 Water Quality

Proposed Action and Alternative 1. Implementation of the Proposed Action and Alternative 1 would have minor, short-term impacts on surface water quality during the three to six month construction period. Local stormwater erosion may increase

turbidity in local drainages for short periods during construction. These impacts would be minor.

Potential negative impacts to groundwater and surface water resulting from facility operations relate to wastewater discharges. Under the Proposed Action and Alternative 1, industrial wastes would be discharged into the sewer system managed by the Colorado River Sewage System Joint Venture (CRSSJV). Discharges will be in accordance with a required Industrial Wastewater Discharge Permit. An application for Permit to Discharge has been filed by Westates. A copy of a letter from the CRSSJV stating that they have reviewed the proposed Westates Carbon facility discharge estimates and anticipate the system will accommodate the flow without significant impact on the system is attached as Appendix F.

Wastewater discharged from the facility would contain carbon dust and salt. The discharge will contain no hazardous materials as defined under federal law and regulations as of October 1990. Based upon a continuous discharge flow rate of 13 gallons per minute, equivalent to the flow from two 5/8" garden hoses, which equals 18,720 gallons per day or 6.83 million gallons per year, the estimated amounts of carbon dust put into CRSSJV would be 2389 lbs/year; the amount of salt put into CRSSJV would be 438,000 lbs/year.

Alternative 2. Adverse impacts to groundwater and surface water resulting from the on-site evaporation pond would be avoided by proper design and operation of the pond. The construction of a berm around the perimeter of the pond would prevent surface waters from entering and overflowing the pond. The liner would prevent discharges into the pond from leaching into the groundwater.

No Action Alternative. Selection of the No Action Alternative would result in no impacts to water quality.

4.A.4 Land Resources

4.A.4.1 Topography and Physiography

Proposed Action and Alternative 1. The Proposed Action and Alternative 1 would result in the altering of the existing topography and physiography from the grading activities during construction. There is very little topographic relief within the proposed lease site. No significant impacts are expected.

Alternative 2. Alternative 2 would result in the altering of the existing topography and physiography from the grading and pond construction activities during construction of the proposed project. No significant impacts are anticipated.

No Action. Implementation of the No Action Alternative would not affect topographic and physiographic features of the proposed project area.

4.A.4.2 Geologic Setting

Proposed Action and Alternative 1. Given the current land use on the proposed site, no impacts to geologic resources would result from implementing the Proposed Action or Alternative 1.

Alternative 2. Given the current land use on the proposed site, no impacts to geologic resources would result from implementation of Alternative 2.

No Action. Implementation of the No Action Alternative would not impact geologic resources.

4.A.4.3 Soils

Proposed Action and Alternative 1. Soils at the proposed site location will be disturbed during the construction phase of the facility. Blowing sand could occur during periods of high winds. No significant erosion is expected to result from construction activities.

Alternative 2. Alternative 2 would result in soils at the site being disturbed during construction. Excavation and movement of soils would occur during construction of the evaporation pond. Soil testing would be required to determine if soil modification or import would be necessary for pond construction.

No Action Alternative. The No Action Alternative would not affect soils of the proposed project area.

4.A.4.4 Land Use

Proposed Action and Alternatives 1 and 2. Implementation of the Proposed Action or Alternatives 1 or 2 would impact land use in that the land on which the facility is sited would be removed from other uses for the life of the lease. In so far as the facility is in the industrial park, any such other uses would be industrial or commercial.

No Action Alternative. The No Action Alternative would not impact land use.

4.A.5 Other

4.A.5.1 Transportation Network

Proposed Action and Alternatives 1 and 2. The Proposed Action and Alternatives 1 and 2 would impact area roads and highways. Increased traffic would occur on State Highway 95 and on the access roads to the proposed site, Mojave Road and Mutahar Street.

During the construction phase, traffic would include construction equipment and construction workers. These impacts would be short-term. Post construction impacts would include increased traffic from facility employees and trucks delivering activated carbon. These long-term impacts are not expected to be significant in that the proposed facility will employ approximately 18 people and receive only about six shipments of carbon per week.

No Action Alternative. Selection of the No Action Alternative would result in no impacts to the transportation network.

4.B IMPACTS ON THE BIOLOGICAL ENVIRONMENT

4.B.1 Analysis of Impacts on Flora

Proposed Action and Alternative 1. About 40% of the 10-acre site will be utilized for the proposed facility. A limited amount of creosotebush, burrobush, cholla, etc., will be removed during the construction of the facility. The remainder of the site will be left undisturbed. No endangered or threatened plants are known to exist in the area.

Alternative 2. Under Alternative 2, essentially all vegetation would be removed for construction of the facility and evaporation pond.

No Action Alternative. Implementation of the No Action Alternative would not impact the existing flora.

4.B.2 Analysis of Impacts on Fauna

Proposed Action and Alternatives 1 and 2. The facility would have little effect on wildlife habitat. There will be a limited loss of wildlife habitat due to removal of vegetation during construction, however, the site is located in a creosotebush and burrobush community that affords a rather poor habitat. No endangered animals are found in the proposed project area.

No Action Alternative. The No Action Alternative would result in no impact to the existing fauna.

4.C IMPACTS ON THE SOCIOECONOMIC AND SOCIOCULTURAL ENVIRONMENT

Proposed Action and Alternatives 1 and 2. The development of the project site in the C.R.I.T. Industrial Park will provide land lease payments to the Colorado River Indian Tribes. The rental rate for the first year of the primary term of the lease will be \$20,000. The initial lease rate will be adjusted for inflation in subsequent years. In addition, the rental rate will be reviewed every five years and redetermined based upon a fair market rental value appraisal.

Westates Carbon, Inc. expects to hire about 17 employees from the Parker area to initially staff the proposed facility. As a condition of the lease agreement, Westates agrees to give employment preference to Indians. Job descriptions and salaries for the expected staffing requirements are summarized below:

Expected Staffing

1	Plant Manager (salary)		\$35,000/yr.
1	General Foreman (salary)		\$25,000/yr.
	<u>Administration (Hourly)</u>	<u>Start</u>	<u>Top</u>
1	Clerks	\$ 4.50	\$ 6.50
1	Clerks w/Computer Experience	6.50	9.00
1	Laboratory Technicians	4.50	9.00
	<u>Maintenance (Hourly)</u>		
1	Master Craftsman	--	15.00
1	Craftsman	--	12.00
1	Helper	4.50	6.50

Expected
Staffing
Cont'd.

<u>Operations (Hourly)</u>			
4	Loadperson (rotating shift)	--	9.00
4	Helper (rotating shift)	4.50	8.50
2	Warehouse/Labor	4.50	8.50

If 17 persons from the C.R.I.T. labor force are employed at the facility, unemployment would be reduced from 579 to 562. This would reduce the direct unemployment rate of the Reservation from 49% to 47.8%.

No Action Alternative. The No Action Alternative would result in no impacts on the socioeconomic and sociocultural environment.

4.D IMPACTS ON HISTORIC AND ARCHEOLOGICAL FEATURES

Proposed Action and Alternatives 1 and 2. An identification survey of historical properties in the proposed area of impact for this undertaking by the C.R.I.T. museum produced no results. Therefore, the proposed lease should have no effect on any properties eligible for the National Register of Historic Places. The results of the C.R.I.T. museum survey has been provided to the Arizona State Historic Preservation Officer.

No Action Alternative. The No Action Alternative would result in no impacts on historic and archeological features.

4.E CUMULATIVE IMPACTS

Residential and industrial development of the Colorado River Indian Reservation is presently active. Proposed developments reflect an effort by the tribe to pursue economic development on their reservation which include increasing tribal revenues and employment opportunities.

There is potential for proposed projects in the Industrial Park. Currently there are no projects proposed at this time. However, there is a Bureau of Reclamation office building approximately one block away from the proposed plan site. An update of the master plan of C.R.I.T.'s airport is underway to upgrade and facilitate anticipated growth in the area. The airport is located approximately 1 mile north of the Industrial Park. The potential for growth, including the Proposed Action, will affect the physical, biological and human resources of the region. Regional development and tribal development will alter some of the existing open space and agricultural lands to a more urban-type environment including the Industrial Park concept. The resulting cumulative impacts are listed below.

Physical Environment

- Water Resources - reduction of 0.022 percent in tribal water allocations.
- Water Quality - some degradation due to wastewater effluent, soil erosion and recreation use.
- Air Quality - fugitive dust from construction and increased travel on unpaved roadways; increases in automobile emissions.

- Visual Resources - changes in the character of the visual environment, from natural open space and agricultural areas to a more urban environment.

Biological Environment

- Biological Resources - native plants and wildlife losses; reduction in wildlife habitat.

Human Environment

- Socioeconomic Conditions - changes are anticipated in the community infrastructure, lifestyles of the residents, employment opportunities, housing availability, facilities and services available; availability of construction workforce.
- Land Use - commitment of reservation land for mixed-use development, precluding the use for other purposes such as agriculture; reduction in public access to outdoor recreation resources such as the Colorado River; increased traffic on the existing roadways.
- Noise Quality - increased noise levels from an increase in construction and operational activity in the area.

4.F UNAVOIDABLE ADVERSE IMPACTS

Implementation of mitigation measures can reduce or eliminate adverse impacts associated with the Proposed Action. Unavoidable adverse impacts are those that remain after the application of mitigation measures. These impacts must be considered in the context of growth which is occurring in the area and which would continue regardless of whether or not the Proposed Action is implemented. Unavoidable adverse impacts associated with the proposed Westates Carbon Reactivation Plant are listed below.

Water Resources. The Proposed Action would use approximately 161.2 net acre-feet of water annually. The use of this resource would mean that a small portion of the Tribes water supply would not be available for other activities.

Air Resources. A temporary increase in fugitive dust emissions would occur during construction of the Proposed Action. Subsequently, emissions from delivery trucks and worker vehicles would be present over the life of the proposed project. The Proposed Action would be visible from unobstructed viewing locations and lighting would be evidenced at night. This would result in impacts to visual resources over the life of the proposed project. The life of the primary lease is 20 years, with an option for a 20 year extension.

Biological Resources. The Proposed Action would affect ten acres of land located in the Industrial Park area. Existing natural vegetation on about four acres would be cleared. The Proposed Action would result in a small loss of wildlife habitat on the 10 acre proposed site.

4.G RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

For the Proposed Action, short-term is defined as the construction period. Long-term is defined as the operation of the proposed project. Short-term and long-term impacts could be either beneficial or adverse. A list of short-term and long-term impacts follows.

Short-Term Impacts - Beneficial

- Creation of construction jobs.
- Opportunities for employment for tribal members.
- Increase in tribal revenues due to lease payments, fees and taxes.

Short-Term Impacts - Adverse

- Removal of native vegetation and wildlife habitats
- Increased soil erosion.
- Temporary degradation of air quality due to fugitive dust.
- Elevation in noise levels.
- Construction traffic on roadways.

Long-Term Impacts - Beneficial

- Generation of increasing revenues for the Tribe.
- Availability of job training and employment opportunities for tribal members.
- Secondary economic benefits to nearby businesses and attractions.

Long-Term Impacts - Adverse

- Increase in noise levels at the site.
- Increase in traffic volume on area roadways.
- Water consumption.
- Energy consumption.

4.H IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Construction and operation of the Proposed Action would result in either the irreversible or irretrievable commitment of certain resources. An irreversible commitment means that once a change in a resource's status occurs, it cannot be restored to its present status. An irretrievable commitment means that the resource in question cannot be recovered or reused during the period of time the Proposed Action is in effect; however, the action is reversible.

Loss of open space and wildlife habitat, as a result of implementing the Proposed Action, are irretrievable commitments of resources. These losses could be reversed upon expiration of the lease by removing all improvements from the proposed project area and implementing a revegetation program designed to replace natural habitats.

Water and energy used as a result of implementing the Proposed Action represents an irreversible commitment of these resources. Water and energy cannot be stored by the Tribe for use at some future time or upon expiration of the lease agreement.

TABLE 4-1

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

ENVIRONMENTAL IMPACT CATEGORY	ALTERNATIVES			
	PROPOSED ACTION	ALTERNATIVE 1	ALTERNATIVE 2	NO ACTION ALT.
		RELOCATE FACILITY	UTILIZE EVAPORATION POND	NO DEVELOPMENT
AIR QUALITY	No Significant Impact From Incinerator Emissions	No Significant Impact From Incinerator Emissions	No Significant Impact From Incinerator Emissions	No Impact
NOISE	No Significant Impact; Direct and Indirect; Short-Term and Long- Term	No Significant Impact; Direct and Indirect; Short-Term and Long- Term	No Significant Impact; Direct and Indirect; Short-Term and Long- Term	No Impact
WATER SOURCES	No Significant Impact; Reduction of Tribe's Water Supply by 161.2 Acre-Ft/Yr	No Significant Impact; Reduction of Tribe's Water Supply by 161.2 Acre-Ft/Yr	No Significant Impact; Reduction of Tribe's Water Supply by 161.2 Acre-Ft/Yr	No Impact
WATER QUALITY	No Significant Impact; Discharge 18,700 GPD to Local Wastewater System	No Significant Impact; Discharge 18,700 GPD to Local Wastewater System	No Significant Impact; Discharges to On-Site Evaporative Pond	No Impact
LAND RESOURCES	No Significant Impact; Moderate Grading	No Significant Impact; Moderate Grading	No Significant Impact; Moderate Grading and Pond Construction	No Impact
GEOLOGIC SETTING	No Significant Impact	No Significant Impact	No Significant Impact	No Impact
SOILS	No Significant Impact; Slight Potential for Soil Erosion During Construction	No Significant Impact; Slight Potential for Soil Erosion During Construction	No Significant Impact; Slight Potential for Soil Erosion During Construction	No Impact

TABLE 4-1 (Cont.)

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

ENVIRONMENTAL IMPACT CATEGORY	ALTERNATIVES			
	PROPOSED ACTION	ALTERNATIVE 1	ALTERNATIVE 2	NO ACTION ALT.
		RELOCATE FACILITY	UTILIZE EVAPORATION POND	NO DEVELOPMENT
LAND USE	No Significant Impact	No Significant Impact	No Significant Impact	No Impact
TRANSPORTATION NETWORK	No Significant Impact; Increased Traffic From 18 Employees and 6 Trucks	No Significant Impact; Increased Traffic From 18 Employees and 6 Trucks	No Significant Impact; Increased Traffic From 18 Employees and 6 Trucks	No Impact
VEGETATION	No Significant Impact; Loss of Some Vegetation	No Significant Impact; Loss of Some Vegetation	No Significant Impact; Loss of Some Vegetation	No Impact
SOCIOECONOMIC AND SOCIOCULTURAL ENVIRONMENT	Beneficial Impact; Increased Employment Opportunities	Beneficial Impact; Increased Employment Opportunities	Beneficial Impact; Increased Employment Opportunities	Tribe Would Not Benefit From Economic and Employment Potential
HISTORIC AND ARCHEOLOGICAL FEATURES	No Significant Impact	No Significant Impact	No Significant Impact	No Impact



CHAPTER 5

MITIGATION MEASURES

Implementation of mitigation measures can reduce or eliminate adverse impacts associated with a proposed action or alternatives. The following measures have been developed to mitigate the impacts anticipated as a result of the Proposed Action.

5.A PHYSICAL ENVIRONMENT

A Contingency and Emergency Response Plan will be developed for the facility. This is a written plan that defines the actions that will be taken during an emergency (fire, explosion, or threatened release of hazardous waste) to minimize hazards to human health and the environment.

5.A.1 Air

5.A.1.1 Quality

Combustion parameters, pollution control equipment effectiveness, and air emissions will be monitored on a continuous basis as part of standard operating procedure by plant personnel. Additionally, periodic plant inspections will be performed by Tribal environmental personnel and professional environmental consultants directed by Tribal authorities.

Water spray will be applied to reduce blowing dust during construction. The construction contractor will be given responsibility for providing water for dust control.

5.A.1.2 Noise

Mufflers, enclosures, and other noise suppression measures will be incorporated as required at the facility to keep noise beyond the property line at acceptable levels.

Work schedules will be designed to minimize or reduce noise levels during sensitive times of the day, i.e. in the evening and early morning hours.

5.A.2 Water

Water utilized at the facility will be recycled. A groundwater monitoring well will be installed to provide background information on the groundwater quality at the site.

Curbs for spill containment will be installed and the Emergency Response Plan will be implemented to recover spills at the time of occurrence.

5.A.3 Land Resources

No unnecessary disturbances, those not required by the proposed project, of soils and land surface will be made.

5.A.4 Other

5.A.4.1 Transportation Network

The Office of Hazardous Materials Transportation, U.S. Department of Transportation, has developed detailed procedures and guidelines to handle incidents involving hazardous materials during transportation. These procedures are detailed in the Emergency Response Guidebook (ERG) (DOT P 5800.4). The ERG is a guide to assist first responders in making informed judgments

during the initial phases of a transportation incident. The ERG has been widely distributed to state and local public safety authorities.

5.B SOCIOECONOMICS AND SOCIOCULTURAL ENVIRONMENT

5.B.1 Hiring of Indians

Members of the CRIT shall be given employment preference when qualified and available.

CHAPTER 6

LIST OF AGENCIES AND INDIVIDUALS CONTACTED FOR CONSULTATION

The persons and organizations listed below were contacted or submitted comments during the preparation of this document.

STATE AGENCIES

Arizona Department of Commerce
Arizona Department of Transportation
Arizona Secretary of State
Arizona Department of Environmental Quality
Arizona State Parks Department, Phoenix, Arizona

FEDERAL AGENCIES

Bureau of Land Management, Yuma District
USDA Soils Section, Phoenix, Arizona
U.S. Bureau of Reclamation, Boulder City, Nevada
U.S. Fish and Wildlife Service, Phoenix, Arizona
U.S.G.S. Water Resources, Phoenix, Arizona
Bureau of Indian Affairs, Phoenix Area Office
U.S. Environmental Protection Agency - Region IX

LOCAL AGENCIES

Colorado River Sewage System, Joint Venture
Parker Regional Airport

TRIBAL AGENCIES

C.R.I.T., Parker, Arizona

CHAPTER 7

LIST OF PREPARERS

Bureau of Indian Affairs

Amy L. Heuslein

POSITION: Environmental Protection Specialist

EDUCATION/EXPERIENCE: B.S., Biology, Stephens College
12 years professional experience

EA RESPONSIBILITY: As Federal Project Manager, Ms. Heuslein was responsible for reviewing and approval recommendation of EA.

C. Randall Morrison

POSITION: Area Archeologist

EDUCATION/EXPERIENCE: M.S., Anthropology, University of Arizona; B.A., Anthropology, University of New Mexico
16 years professional experience

EA RESPONSIBILITY: As Federal Assistant, Mr. Morrison was responsible for assisting the Federal Project Manager in the EA review

Ethel T. Goodman

POSITION: Realty Specialist/Colorado River Agency
Environmental Coordinator

EDUCATION/EXPERIENCE: 3 Years Training in Business Administration
22 Years Professional Experience

EA RESPONSIBILITY: As Agency Environmental Coordinator for the Colorado River Agency, Ms. Goodman was responsible for attending all meetings concerning the EA, including its review and approval of its preparation.



Oklahoma University

Dr. Larry W. Canter

DISCIPLINE/EXPERTISE: Environmental Engineering/EIS
Preparation/Water Resources and Ground
Water Pollution Control

EXPERIENCE: 23 years Professor Civil Engineering and
Environmental Science, Oklahoma
University; Director, Environmental
and Ground Water Institute, Oklahoma
University

EA RESPONSIBILITY: Advisor and editing

Simon-EEI

William E. Curry

DISCIPLINE/EXPERTISE: Hydrogeology

EXPERIENCE: 17 years as geologist, 7 of which
worked as independent

EA RESPONSIBILITY: Hydrogeology and report writing,
editing

Mike Shoeleh

DISCIPLINE/EXPERTISE: Mechanical Engineering; Industrial
Technology; Civil/Environmental
Engineering

EXPERIENCE: Independent consultant for 4 years;
Performance Engineer for Public Service
Company of Oklahoma for 7 years

EA RESPONSIBILITY: Air quality

Dr. Robert A. Shapiro

DISCIPLINE/EXPERTISE: Mechanical/Petroleum/Industrial Engineering

EXPERIENCE: 8 years consulting work; 6 years Professor Industrial Engineering, Oklahoma University; 8 years as Director of Industrial Engineering; Assistant to University President-Designate and Associate Vice President for Administration and Finance, Oklahoma University; and 8 years Division Production Engineer

EA RESPONSIBILITY: Project Manager

Bill Torneten

DISCIPLINE/EXPERTISE: Civil/Environmental Engineering; Registered P.E.

EXPERIENCE: 6 years with USGS; 9 years general consulting in petroleum, civil and environmental engineering

EA RESPONSIBILITY: Air quality, editing



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PERSONAL COMMUNICATIONS

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- Arizona State University. 1990. Personal communication with Bill Curry, Simon-EEI, requesting climatological data for Parker, Arizona. February 2, 1990.

- Babbitt, Robert. 1991. Westates Carbon. Personal communication with Bill Torneten, Simon-EEI, regarding transportation routes. January 25, 1991.
- Berg, Steve. 1990. Arizona Department of Environmental Quality. Personal communication with Bill Curry, Simon-EEI, regarding the states environmental protection standards. January 23, 1990.
- Bush, Robert. 1990. Arizona Department of Transportation. Personal communication with Bill Curry, Simon-EEI, regarding traffic counts. February 28, 1990.
- Byestewa, Conner. 1991. Colorado River Indian Tribes. Personal communications with Bill Torneten, Simon-EEI, regarding the tribal water allotment. January 29, 1991.
- Cole, Bill. 1990. Parker community Hospital. Personal Communication with Bill Curry, Simon-EEI, regarding medical services and facilities. March 23, 1990.
- Garcia, Robert. 1990. Colorado River Sewage System Joint Venture. Personal communication with Bob Shapiro, Simon-EEI, regarding wastewater discharge permit. November 5, 1990.
- Johnson, Bill. 1990. U.S. Department of Agriculture. Personal communication with Bill Curry, Simon-EEI, regarding soils publications for the Colorado River Indian Reservation. January 23, 1990.
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- Spiller, Sam. U.S. Fish and Wildlife Service, 1990. Personal communication with Bill Curry, Simon-EEI, regarding threatened or endangered species of wildlife and vegetation that inhabit the area. February 6, 1990.
- Turner, Shereen. 1990. Arizona State Parks Department. Personal communication with Bill Curry, Simon-EEI, requesting a written historical and archeological evaluation of the site. February 16, 1990.
- Thompson, Bert. 1990. U.S. Geological Survey. Personal communication with Bill Curry, Simon-EEI, regarding availability of hydrologic atlas. January 24, 1990.

Waldron, Mary Alice. 1990. Arizona Department of Environmental Quality. Personal communication with Bill Curry, Simon-EEI, regarding state air and water quality standards. February 3, 1990.

Walker, Dave. 1990. Arizona Fish and Game Department. Personal communication with Bill Curry, Simon-EEI, regarding potential impacts to fish and wildlife. March 7, 1990.

Weaver, Bob. 1990. Arizona Fish and Game Department. Personal communication with Bill Curry, Simon-EEI, regarding concerns the Department had related to threatened and endangered species of wildlife and vegetation indigenous to the site. February 6, 1990.

Werner, Bill. 1990. Bureau of Land Management. Personal communication with Bill Curry, Simon-EEI, regarding resource management plan. July 9, 1990.

**CONTENTS
OF
APPENDICES**

APPENDIX A

Letter from Jacqueline Wyland, Chief, Office of Federal Activities, EPA Region IX, to Barry Welch, Acting Area Director, BIA, dated September 20, 1990.

Letter from Michael Freeley, Chief, Permits and Solid Waste Branch, EPA Region IX, to Robert J. Babbitt, Project Manager, Westates Carbon, Inc., dated October 18, 1990.

APPENDIX B

Scientific and common names of plant species in the Yuma District.

Scientific and common names of animal species mentioned in the RMP-EIS.

APPENDIX C

Letter from David Walker, Habitat Evaluation Coordinator, Arizona Game and Fish Department, to William Curry, Hydrogeologist, Simon-EEI, dated March 8, 1990.

Letter from William Curry, Hydrogeologist, Simon-EEI, to Gilbert Metz, Acting Field Supervisor, U.S. Department of the Interior, Fish and Wildlife Service, dated March 1, 1990.

APPENDIX D

Community profile, Town of Parker, Arizona Department of Commerce.

Community profile, Colorado River Indian Reservation, Arizona Department of Commerce.

APPENDIX E

Letter from William Curry, Hydrogeologist, Simon-EEI, to Shereen Turner, State Historical Reservation Officer, Arizona State Parks Department, dated February 16, 1990.

C.R.I.T. Museum Archaeological Walk-Over Form, submitted by Weldon Johnson, Assistant Museum Director.

Letter from Robert Gasser, Compliance Coordinator, Arizona State Parks, to Wilson Barber, Area Director, BIA, dated November 29, 1990.

APPENDIX F

Letter from Robert Garcia, General Manger, Colorado River Sewage System Joint Venture, to Robert Shapiro, Project Manager, Simon-EEI, dated November 5, 1990.

APPENDIX G

Summary of public and agency contacts - The summary includes copies of correspondence, some of which are duplicates of letters in Appendices A, C, E, and F of the EA.

APPENDIX A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103

20 SEP 1990



Mr. Barry W. Welch
Acting Area Director
Bureau of Indian Affairs
Phoenix Area Office
P.O. Box 10
Phoenix, AZ 85001

Dear Mr. Welch:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Assessment (DEA) for the Carbon Reactivation Plant, Parker, Arizona, pursuant to the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEA proposes leasing of Colorado River Indian Tribal land in Parker, Arizona, for construction and operation of a carbon regeneration plant to be owned and operated by Westates Carbon, Inc. Approximately 20 percent of the carbon treated at the plant would contain hazardous waste.

EPA cannot ascertain from the information provided in the DEA whether a Part B Resource Conservation and Recovery Act (RCRA) permit would be required for the Westates facility. Nor can we determine whether a Prevention of Significant Degradation (PSD) permit would be required. We recommend that Westates request formal determinations from EPA regarding the need for these two permits. We also request that the Final Environmental Assessment (FEA) include additional information regarding impacts to water quality, wildlife, and noise. Our specific comments are attached.

We appreciate the opportunity to comment on the proposed project. If you have any questions, please contact me at (415) 556-5113, or have your staff contact Jeanne Dunn at (415) 556-5104. Please note that on October 4, we will be moving our

BUREAU OF INDIAN AFFAIRS
PHOENIX AREA DIRECTOR
SEP 24 11 36 AM '90

office to 75 Hawthorne Street, San Francisco, California, 94105.
After that date, you may contact me at 744-1584 or Ms. Dunn at
744-1576.

Sincerely,

E. P. Mitchell; for

Jacqueline Wyland, Chief
Office of Federal Activities

Enclosure

cc: Amy Heuslein, BIA
Daniel Eddy, Chairman C.R.I.T.
Bob Babbitt, Westates Carbon, Inc.
Sam Perkins, Steptoe & Johnson
Roccena Lawatch, EPA OPINAP

General Comments

The statement that the proposed site was selected as being the most environmentally attractive alternative is not substantiated in the DEA (page 2-26). Discussions of other sites that were evaluated focus on the economic or social issues related to those sites but do not address environmental factors involved in site selection. If environmental factors were evaluated in selecting the proposed site over other alternative sites, the FEA should discuss these factors.

Resource Conservation and Recovery Act

1. The DEA indicates that the regeneration of spent carbon is considered to be recycling and is conditionally exempt from Resource Conservation and Recovery Act (RCRA) regulations. At this time, EPA cannot make a determination on the regulatory status of the Westates facility based on information provided in the DEA. Additional information from Westates will be necessary in order for EPA to make this determination. We recommend that Westates request from EPA an official determination of RCRA status for the facility and coordinate with Mr. Larry Bowerman, Chief, Alternative Technology Section, EPA Region 9. This determination could take four to six weeks. If it is determined that a RCRA permit is required, the permitting process could take up to two years.

For your information, in a proposed rule published in the April 27, 1990, Federal Register, EPA determined that "controlled flame carbon regeneration units currently meet the definition of incinerator and have been subject to regulation as such since 1980, while carbon regeneration nonflame units have been treated as exempt reclamation units." In the same proposed rule, however, EPA has proposed to regulate both direct flame and nonflame carbon regeneration units as thermal treatment units under the interim status standards of 40 CFR Part 265, Subpart P, and the permit standards of 40 CFR 264, Subpart X. EPA is concerned that emissions from these devices may present a substantial hazard to human health and the environment if they are not controlled. The proposed rule is expected to be promulgated by mid- to late 1991.

Further, the Subpart X regulations are not specific and leave many of the permitting process decisions up to the individual EPA regions. Should EPA need to evaluate a Part B application and write a permit for this facility in the future, we anticipate that the standards used would be similar to those used for hazardous waste incinerator projects (40 CFR 264 Subpart O). These

standards include a Part B application with detailed design specifications for the equipment, a detailed Risk Assessment for the project using current EPA toxicological values, emissions estimates based on the known emissions from similar operating facilities, and a test burn to ensure that the actual efficiency of the process is at least as high as the efficiency assumed in the Part B application and Risk Assessment. The test burn would also be used to verify emissions and determine operating parameters for the facility.

Until EPA issues a final rule on carbon regeneration units, if we determine that the carbon regeneration unit is conditionally exempt under RCRA, and that the hoppers (discussed in Comment #2 below) are not used for storage, then the Westates facility would only be subject to 40 CFR Part 261.6(c)(2), which requires notification under Section 3010 of RCRA (obtaining an EPA ID number) and 40 CFR Parts 265.71 and 265.72 (regarding the use of the manifest and manifest discrepancies).

2. The DEA states that the facility is designed to eliminate handling practices which would meet regulatory definition of hazardous waste storage. It appears in Figure 2.A.2-1 that the hoppers labeled T-1 and H-1 are used for conveyance of the spent carbon, not storage. In order for the hoppers to remain tied to the operation of the recycling facility, the hoppers could not store any spent carbon when the reactivation furnace was not operating.

3. The FEA should include a more detailed description of how the emission estimates were calculated and compare them to actual emissions data from a similar operating facility.

Air Quality

The DEA does not provide adequate information for EPA to determine at this time whether Federal Prevention of Significant Degradation (PSD) regulations would apply to the proposed facility. Westates should contact Matt Haber, Chief, New Sources Section, EPA Region 9, to request a formal determination of the applicability of PSD regulations to the proposed facility. We understand that Westates has assured the Colorado River Indian Tribes that, if the facility is not subject to Federal permit review, it would comply with all State of Arizona air quality standards, regardless of whether the State has jurisdiction on Federal land. We suggest that, if EPA determines that Federal regulations do not apply, the Bureau of Indian Affairs coordinate with the Arizona Department of Environmental Quality to ensure protection of air quality.

Water Quality

1. According to the DEA, material "spills" could contaminate groundwater beneath the proposed project site during construction and operation if mitigation measures were not implemented and maintained. The FEA should identify all potential contaminant sources during construction and operation and all proposed controls to prevent accidental spills or other hazardous materials releases.

2. During construction, control measures should be implemented to prevent erosion and runoff of soils to surface water channels. Following construction, the site should be revegetated or otherwise restabilized to prevent future erosion of the disturbed soils.

3. According to the DEA (page 4-18), environmental audits would be conducted at regular and unannounced times to ensure proper mitigation measures are followed and that the Emergency Response Plan is up to date. The FEA should identify who would perform these audits.

4. Mitigation measures for ensuring compliance with the pretreatment standards for the Colorado River Sewage System Joint Venture (CRSSJV) are provided on pages 4-20 and 4-21 of the FEA. It is our understanding that evaporation ponds and detention ponds would not be constructed at the proposed project site and that effluent from the carbon regeneration facility would be blended with other CRSSJV influent to meet the wastewater treatment facility's National Pollutant Discharge Elimination System permit.

Wildlife

The FEA should discuss whether the Mohave Fringe-toed lizard also derives benefits from the cactus plain area outside the nearby dune ecosystem, which could be adversely affected by development of the 10-acre parcel for the proposed project. Further, the FEA should address potential foreseeable cumulative impacts of future development in the industrial park on the lizard.

Noise

Under worst case conditions, construction noise levels could be as high as 89 dBA at a distance of 50 feet from the noise source. The FEA should identify what noise levels would be expected, under these conditions, at the Bureau of Land Management office across the road from the proposed project site. Is it expected that office workers would be affected? How could construction noise be mitigated?



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103

OCT 18 1990

In Reply
Refer to: H-3-3

Robert J. Babbitt
Project Manager
Westates Carbon, Inc.
2131 Ico Avenue
Los Angeles CA 90040-1634

Mr. Babbitt:

We received your letter dated September 14, 1990, requesting regulatory determination on a proposed carbon regeneration facility to be located in Parker, Arizona.

In consultation with EPA headquarters, we have determined that, at this time, carbon regeneration facilities without storage are not subject to the hazardous waste treatment and permitting regulations contained in 40 CFR Parts 264 and 270. However, carbon regeneration facilities are currently subject to all regulations for facilities handling recyclable materials (40 C.F.R. 171.11-171.19), including notification and manifest requirements. You should file EPA Form 8700-12 (01-90) "Notification of Regulated Activity" to obtain a federal identification number.

EPA and FIA intends to regulate carbon regeneration facilities under 40 CFR Part 264, Subpart X; 40 CFR 265, Subpart F; and 40 CFR Part 270 (proposed April 27, 1990 at 55 FR page 17411-17419). When these regulations are promulgated carbon regeneration units will be required to submit "Part B" applications and obtain a RCRA permit.

We hope this information will be useful to you. If you have any questions please call Jim Bergkamp of my staff at 744-2056.

Sincerely,

Michael Feeley, Chief
Permits and Solid Waste Branch

cc: Al Poeslter, AZDEQ



APPENDIX B

APPENDIX

ANIMAL AND PLANT SPECIES MENTIONED IN THE RMP-EIS

Plant species in Yuma District (listed in Table F-1 below) are described in Chapter 3 (*Affected Environment*)

under Vegetation Resources. Animal species (listed in Table F-2) and their habitat are described in Chapter 3 under Wildlife.

Table F-1: SCIENTIFIC AND COMMON NAMES OF PLANT
SPECIES IN THE YUMA DISTRICT
Bureau of Land Management, Yuma District

SCIENTIFIC NAME	COMMON NAME	SCIENTIFIC NAME	COMMON NAME
<i>Adonia viridula</i>	sand verbena	<i>Cooperia spinosa</i>	crucifixion thorn
<i>Acacia greggii</i>	catclaw acacia	<i>Krameria</i> spp.	ratany
<i>Agave</i> spp.	Agave	<i>Laurea tridentata</i>	steosoxebush
<i>Amarvillidaceae</i>	<i>Amarvillus</i> family	<i>Linaceae</i>	<i>Lily</i> family
<i>Ambrosia deltoidea</i>	burrobrush	<i>Lupinus</i> spp.	lupine
<i>Ambrosia dumosa</i>	white bursage	<i>Lythrum</i> spp.	desert thorn
<i>Ammobroma goniorae</i>	sandfoof	<i>Mentzelia nitens</i> <i>epitocaulis</i>	unnamed stick leaf
<i>Antirrhinum filipes</i>	snaptadragon	<i>Muhlenbergia porteri</i>	bush muhly
<i>Atriplex canescens</i>	desert holly	<i>Nemacaulis densata</i>	woolly heads
<i>Atriplex</i> spp.	saltbush	<i>Nolina argentea</i>	Nolina
<i>Bursera microphylla</i>	elephant tree	<i>Pinus tesota</i>	ironwood
<i>Canotia holacantha</i>	canotia	<i>Opuntia basilaris</i>	beavertail cactus
<i>Carnegiea gigantea</i>	saguaro	<i>Opuntia</i> spp.	Opuntia
<i>Cercidium floridum</i>	blue palo verde	<i>Opuntia virginica</i>	Wiggins cholla
<i>Cercidium microphyllum</i>	foothill palo verde	<i>Palatania arida</i> <i>gigantea</i>	giant Spanish needle
<i>Cereus greggii</i>	night-blooming cereus	<i>Parkinsonia aculeata</i>	Jerusalem-thorn
<i>Coleogyne tomentosissima</i>	blackbrush	<i>Phorisma arenarium</i>	scalp sandplant
<i>Coryphantha vivipara</i> <i>diversa</i>	foxtail cactus	<i>Phragmites communis</i>	carizo
<i>Crassulaceae</i>	<i>Opine</i> family	<i>Pinus</i> spp.	pine
<i>Cynodon dactylon</i>	Bermuda grass	<i>Plantago</i> spp.	Indian wheat
<i>Dalea spinosa</i>	smoke tree	<i>Pluchea sericea</i>	arrowweed
<i>Datura meteloides</i>	sacred datura	<i>Poligonum rusiforme</i>	unnamed smartweed
<i>Encelia farinosa</i>	brittlebush	<i>Populus tremula</i>	cottonwood
<i>Ephedra</i> spp.	joint fir	<i>Prosopis juliflora</i>	mesquite
<i>Equisetum</i> spp.	horsetail	<i>Prosopis juliflora</i>	honey mesquite
<i>Eriogonum</i> spp.	buckwheat	<i>Prosopis pubescens</i>	screw bean mesquite
<i>Eschscholzia mexicana</i>	California poppy	<i>Rhus kearneyi</i>	Kearney's sumac
<i>Euphorbia planisperma</i>	flat-seeded spurge	<i>Salix</i> spp.	willow
<i>Euphorbia polycarpa</i>	sandmat	<i>Sarcocaulis vermiculatus</i>	greasewood
<i>Ferocactus acanthodes</i> <i>acanthodes</i>	barrel cactus	<i>Scirpus</i> spp.	bulrush
<i>Ferocactus</i> spp.	barrel cactus	<i>Sphaeralcea</i> spp.	globe mallow
<i>Fouquieria splendens</i>	ocotillo	<i>Stephanomeria schottii</i>	Schott's wire-herb
<i>Helianthus niveus</i> <i>leptodes</i>	desert sunflower	<i>Stillingia linearifolia</i>	linear-leaved sand spurge
<i>Hesperocaulis undulata</i>	desert lily	<i>Stipa</i> spp.	needle grass
<i>Hilaria rigida</i>	big galleta grass	<i>Tamarix</i> spp.	saltcedar
<i>Holacantha emoryi</i>	crucifixion thorn	<i>Triteleopsis palmeri</i>	unnamed lily
<i>Hymenoclea salsola</i>	cheesebush	<i>Typha</i> spp.	cattail
<i>Hyssopus emoryi</i>	desert lavender	<i>Yucca brevifolia</i>	Joshua tree

SOURCE: BLM 1964

From Appendix E - Yuma District Resource Management Plan and Environmental Impact Statement, 1985.

APPENDIX

TABLE F-2: SCIENTIFIC AND COMMON NAMES OF ANIMAL SPECIES MENTIONED IN THE RMP-EIS

Bureau of Land Management, Yuma District

SCIENTIFIC NAME	COMMON NAME
Mammals	
<i>Antilocapra americana</i>	Pronghorn antelope
<i>Eutamias amoenus</i>	Spotted bat
<i>Felis concolor brown</i>	Yuma puma (mountain lion)
<i>Lutra canadensis</i>	River otter
<i>Odocoileus hemionus</i>	Mule deer
<i>Ovis montanus</i>	Desert bighorn sheep
<i>Sylvilagus auduboni</i>	Desert cottontail
Birds	
<i>Accipiter cooperii</i>	Cooper's hawk
<i>Accipiter striatus</i>	Sharp-shinned hawk
<i>Anas platyrhynchos</i>	Mallard
<i>Anas strepera</i>	Gadwall
<i>Aquila calurus</i>	Golden eagle
<i>Branta canadensis</i>	Canada goose
<i>Buteo lineatus</i>	Zone-tailed hawk
<i>Buteo swainsoni</i>	Red-tailed hawk
<i>Bubo virginianus</i>	Black hawk
<i>Callipepla gambeli</i>	Gambel's quail
<i>Cathartes aura</i>	Great egret
<i>Chondestes montanus</i>	Mountain plover
<i>Circus hudsonius</i>	Marsh hawk
<i>Colaptes auratus</i>	California yellow-billed cuckoo
<i>Egretta alba</i>	Snowy egret
<i>Falco sparverius</i>	Prairie falcon
<i>Falco peregrinus</i>	Peregrine falcon
<i>Falco sparverius</i>	Kestrel
<i>Haliaeetus leucorhynchos</i>	Bald eagle
<i>Larus californicus</i>	California black rail
<i>Nyctalex nyctalex</i>	Black-crowned night heron
<i>Oxyechus macrotis</i>	Ruddy duck
<i>Pandion haliaetus</i>	Osprey
<i>Pernis ptilorhynchus</i>	Harris hawk
<i>Pelecanus occidentalis</i>	California brown pelican
<i>Rallus longirostris</i>	Yuma clapper rail
<i>Sterna bergii</i>	California least tern
<i>Tyrannus melancholicus</i>	Tropical kingbird
<i>Vireo gilvus</i>	Bell's vireo
<i>Zenaidura macroura</i>	White-winged dove
<i>Zenaidura macroura</i>	Mourning dove
Amphibians and Reptiles	
<i>Gerrhonotus elegans</i>	Desert tortoise
<i>Hemidactylus swinhonis</i>	Gila monster
<i>Hyla regilla</i>	Pacific tree frog
<i>Phrynosoma m. m. m.</i>	Flat-tailed horned lizard
<i>Uma notata</i>	Fringe-toed lizard
Fish	
<i>Gila cypris</i>	Bonytail chub
<i>Ictalurus punctatus</i>	Channel catfish
<i>Lepomis macrochirus</i>	Bluegill
<i>Micropterus salmoides</i>	Largemouth bass
<i>Micropterus salmoides</i>	Striped bass
<i>Plecoglossus altivelis</i>	Flathead catfish
<i>Pseudocoryphopterus</i>	Woundfin
<i>Poecilia latipinna</i>	Gila top minnow
<i>Pomoxis nigromaculatus</i>	Crappie
<i>Protopriscus acutus</i>	Colorado River squaw fish
<i>Xylocopa texensis</i>	Razorback (humpback) sucker

Source: BLM, Yuma District Office files, 1984

From Appendix E - Yuma District Resource Management Plan and Environmental Impact Statement, 1985.

**GAME & FISH DEPARTMENT**

2222 West Greenway Road, Phoenix, Arizona 85023 (602) 942-3000

Gov.
Rose MoffordCommissioners:
Frances W. Werner, Tucson, Chair
Thomas G. Woods, Jr., Phoenix
Phillip W. Ashcroft, Eagar
Gordon K. Whiting, Klondyke
Larry Taylor, Yuma ..Director
Duane L. ShroufeDeputy Director
Thomas W. Spalding

March 8, 1990

Mr. William E. Curry
Staff Hydrogeologist
Engineering Enterprises, Inc.
1225 West Main
Norman, Oklahoma 73069

Dear Mr. Curry:

Re: Carbon Recycling Plant near Parker, Arizona

The Arizona Game and Fish Department has reviewed your letter of February 6, 1990 requesting information to complete an environmental assessment for a carbon recycling plant near Parker, Arizona, and the following comments are provided.

We do not anticipate significant adverse impacts to wildlife resources from the development of the site itself. We are, however, concerned about the nature of the operation of the plant and the potential for off-site impacts from the waste products generated in the recycling process. Our specific concerns include the maintenance and monitoring of air and water quality standards. We understand that these concerns will be addressed in the environmental assessment currently being prepared for this project.

While the plant location is essentially "in-town", the unique habitats associated with the Cactus Plains dunes ecosystem begin a short distance to the east. The dunes provide habitat for the Mohave fringe-toed lizard (Uma scoparia), a candidate species on the Arizona Threatened Native Wildlife list. This lizard is primarily threatened by loss of habitat.

We appreciate the opportunity to review this proposal during the development of the environmental assessment. If you need any additional information, please contact Bill Werner, Yuma Regional Habitat Specialist, at (602) 344-3436.

Sincerely,

A handwritten signature in cursive script that reads "David L. Walker".

David L. Walker
Habitat Evaluation Coordinator
Habitat Branch

DW:WEW:jj

cc: Larry Voyles, Supervisor, Yuma Regional Office



11AM 3 1990

**UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE**

ECOLOGICAL SERVICES
3616 W. Thomas, Suite 6
Phoenix, Arizona 85019

2-21-90-I-100

March 1, 1990

William E. Curry
Staff Hydrogeologist
Engineering Enterprises, Incorporated
1225 W. Main
Norman, Oklahoma 73069

Dear Mr. Curry:

This responds to your letter dated February 6, 1990, requesting a list of species federally listed or proposed to be listed as threatened or endangered. The proposal action involves the construction of a carbon recycling plant. Your geographic area of interest is in La Paz County, Arizona.

Our data indicate no listed species would be affected by the proposed action.

If we can be of further assistance, please contact our office (Telephone: 602/379-4720).

Sincerely,

Gilbert D. Metz
Acting Field Supervisor

cc: Regional Director, Fish and Wildlife Service, Albuquerque, New Mexico
(FWE/HC)
Director, Arizona Game and Fish Department, Phoenix, Arizona



APPENDIX D



PARKER

Phoenix

Tucson

PARKER EMPLOYMENT STRUCTURE

Percent of

	Total
Agriculture & Mining	10.7%
Construction	7.7
Manufacturing	1.1
Transportation, Communication & Public Utilities	3.6
Wholesale Trade	1.9
Retail Trade	21.1
Finance, Insurance & Real Estate	7.5
Services	31.9
Public Administration	14.4

Source: U.S. Census Bureau, 1980

LABOR FORCE DATA

Parker

La Paz County

	1987	1988	1987	1988
Civilian Labor Force	1,329	1,379	5,185	5,365
Employed	1,251	1,306	4,700	4,910
Unemployed	78	73	485	455
Employment Rate	5.9%	5.3%	9.4%	8.5%

Source: Arizona Department of Economic Security

GROWTH INDICATORS

	1986	1987	1988
Taxable Sales (\$)	24,801,050	24,723,285	26,256,850
Postal Receipts (\$)	**670,135	**780,836	441,699
New Building Permits Issued*	293	73	75
Public School Enrollment	1,950	2,013	2,047
Net Assessed Valuation (\$)	11,379,923	11,504,325	12,136,085

* La Paz County permits for 1988 were 822, Arizona Business.

Arizona State University

** County totals

PROPERTY TAX RATE PER \$100 ASSESSED VALUATION

	1986	1987	1988
Unified School District*	\$2.70	\$4.03	\$3.42
Community College	1.45	1.43	1.44
La Paz County	2.60	2.63	2.68
State of Arizona	.38	.38	.47
Total Outside Town	7.13	8.47	8.01
Parker	.00	.00	.00
Total	7.13	8.47	8.01

* Parker Unified School District No. 27.

Source: Arizona Tax Research Foundation

POPULATION

1980-1988

Compound

Percentage Change

	1980	1988	
Parker	2,542	3,035	+2.2%
La Paz County	12,557	14,500	+1.8
Arizona	2,718,215	3,548,400	+3.4

* Area population includes a 30 mile radius on both the California and Arizona side of the Colorado River.

Sources: Arizona Department of Economic Security,
U.S. Census Bureau

INTRODUCTION

Parker, at an elevation of 450 feet above sea level, is located on the east bank of the Colorado River, 163 miles west of Phoenix. The Parker "vicinity" consists of a number of separate but interrelated areas. There is the town of Parker, the Arizona side of the Colorado river area, and the communities on the California side. Established in 1871, the town was moved some four miles north to the site of the Atchison, Topeka and Santa Fe Railroad crossing. Parker was founded in 1908 and incorporated in 1948. In May, 1982, by initiative petition, voters formed La Paz County from the northern portion of the former Yuma County. On January 1, 1983, Parker became the county seat for La Paz county.

WEATHER

Month	Average Temperature (°F)		Average Total Precipitation (Inches)
	Daily Max	Daily Min	
January	67.3	37.1	0.53
February	72.9	41.7	0.32
March	78.7	46.6	0.52
April	87.0	53.6	0.22
May	95.3	61.9	0.03
June	103.3	69.6	0.01
July	108.6	78.8	0.30
August	106.7	78.2	0.56
September	102.5	70.2	0.26
October	91.4	57.8	0.29
November	77.5	44.9	0.32
December	68.3	38.1	0.46
Year	88.3	56.5	3.82

Average Total Snow, Sleet and Hail Annually: Trace
(Based on a thirty year average)

PRINCIPAL PARKER ECONOMIC ACTIVITIES

Parker's economy is based primarily on retail trade and services. The 11-mile strip of the Colorado River, contained between Parker Dam and Headgate Rock Dam, form one of the finest bodies of water in the country for water-based recreational activities, making Parker a major destination point for tourists and winter visitors. Motels, campgrounds, mobile home, RV Parks, restaurants, gasoline stations and convenience markets serve both the winter and summer visitor. Parker also serves as the trade center for the Colorado River Indian Reservation and small towns along the Colorado River.

Agriculture, historically the major economic base of Parker, continues to contribute to the local economy. The fertile fields of the Colorado River yield melons, lettuce, cotton, wheat, barley and alfalfa. The 100,000 acre Colorado River Indian Reservation has been guaranteed water for irrigation by the U.S. Supreme Court. The tribe operates small farms but also leases much of their land to large corporate farms.



Arizona
Department of Commerce

State Capitol Tower 1700 W. Washington Phoenix, Arizona 85007 (602) 255-5434

FINANCE

First National Bank of Arizona:	1 office
Security Pacific:	1 office
First Interstate Bank of Arizona:	1 office
Valley National Bank:	2 offices
Mera Bank:	1 office
Desert Sun Bank:	2 offices

La Paz County businesses are eligible for assistance in financing fixed assets through the Development Finance Division, Arizona Department of Commerce.

TRANSPORTATION

Highways:	AZ 72 (connects with U.S. 60) and 95, with access to I-8, I-10 and I-40
Railroads:	Atchison, Topeka and Santa Fe
Bus:	Sun Valley Bus Lines
Truck:	Black Mountain Truck Line and United Parcel Service (interstate), Roadway (intrastate), Milne Truck Line, Frontier Delivery
Airport:	Avi-Suquilla Airport, one 4,800-foot hard surface, lighted runway, UNICOM radio, fuel and ground transportation

COMMUNICATIONS

Newspapers:	Daily: Arizona Republic (Phoenix), Phoenix Gazette, Los Angeles Times, Los Angeles Herald Examiner
	Weekly: Parker Pioneer, Today on the Colorado River, Lake Havasu City Herald, Quartzsite Gem
Radio:	KLPZ, KMDX-FM, and KFWJ (Lake Havasu City), KYOR (Blythe), Phoenix FM stations via cable
Television:	2 local stations, 11 additional stations from Yuma, Phoenix, Tempe, New York, Atlanta and Connecticut via cable and satellite. Includes one sports channel, one educational channel, one religious channel, one movie channel and Home Box Office

UTILITIES

Electricity:	Arizona Public Service Co., Bureau of Indian Affairs
Natural Gas:	Southwest Gas Company
Telephone:	Contel Telephone Company
Water & Sewer:	Municipal

MEDICAL FACILITIES

Hospital:	1 (39 beds) FAA listed
Physicians:	10
Dentists:	4
Naturopathic:	1
Chiropractors:	3
Ambulance service by Parker Ambulance Service with three vehicles, and CRIT-AIR, charter air ambulances. Helicopter pad at hospital.	

GOVERNMENT SERVICES

Local Government:	Mayor, 6 Council Members, Town Manager
Police Department:	1 Chief, 12 officers
Sheriff's Department:	1 Sheriff, 23 deputies, 8 civilians, 8 dispatchers
Fire Department:	27 volunteers
Underwriters Rating:	Grade 6

EDUCATIONAL FACILITIES

	No.	Faculty	Enrollment
Parker Unified School District	4	114	2,047
La Paz County	6	151	2,665

Arizona Western College, a fully accredited two-year community college established in Yuma in 1961, has extension courses available to residents of the Parker area. Parker has 2 preschools, an active Head-Start program and NAU Extension courses.

CHURCHES

2 Catholic	1 Church of Jesus Christ LDS	17 Protestant
2 Baptist		

COMMUNITY FACILITIES

1 Museum	2 Libraries	1 Colorado River Indian Tribal Museum
----------	-------------	---------------------------------------

RECREATION FACILITIES

Area Parks:	6	Indoor Theater:	1
Olympic Size Pool:	1	Rodeo Arena:	1
Lighted Tennis Courts:	2	Senior Citizen Center:	1
Recreation Center	1		
Athletic Facilities:		Baseball field, basketball, handball and badminton courts, golf driving range	

SCENIC ATTRACTIONS

The Colorado River and its dams and lakes offer visitors to Parker a variety of water recreation activities including excellent fishing for bass, crappie, bluegill, catfish, trout, and frogging during season; speed boat racing; tubing and swimming. Parker Dam, the deepest dam in the world, has self-guided tours daily. An 18 hole golf course will open in the fall of 1989.

There are two state parks and one county park in the Parker area. Buckskin State Park, 11 miles north of Parker, has acres of green grass and shade trees. River Island State Park has 26 campsites, day-use areas and boat launches. La Paz County Park, 8 miles north of Parker, has campgrounds, showers, a launching ramp, baseball diamond, golf driving range, tennis courts and 1,000 feet of waterfront, hook-ups and dump station.

A museum containing an extensive collection of locally crafted Indian artifacts, including Chemehuevi basketry, Mojave pottery, Indian beads and jewelry, is operated by the Colorado Indian Tribes.

INDUSTRIAL PROPERTIES

The Colorado River Tribes own a 100-acre industrial park in Parker. Parcels range in size from 2.7 to 12 acres, and all utilities are available. There is also easy access to truck, rail and air transportation. For further information, contact the Colorado River Tribal Council, Parker, AZ 85344, (602) 669-9211 or Parker Area Chamber of Commerce.

LODGING AND MEETING FACILITIES

Motels:	23 with 426 units
Meeting Facilities:	6 with the largest seating 600 persons
Mobile & R.V. Parks:	48 with 3,966 units plus campgrounds for tent camping

HOUSING

Current information on housing availability and prices can be obtained from the Parker Area Chamber of Commerce.

This profile was prepared in cooperation with the Parker Area Chamber of Commerce.

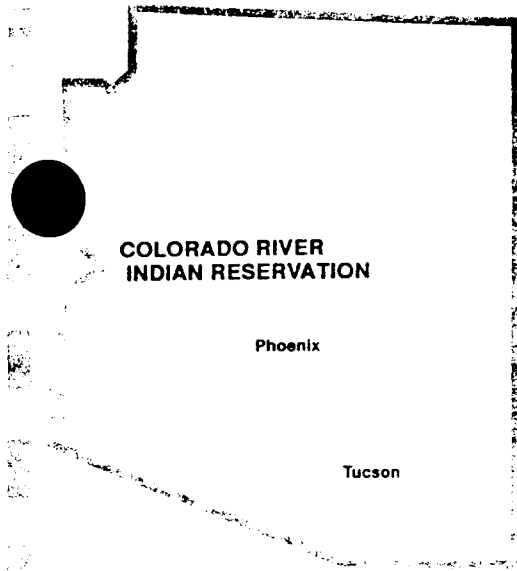
For further information, contact:

Parker Area Chamber of Commerce 1217 California Avenue P.O. Box 627 Parker, AZ 85344 (602) 669-2174	Town of Parker 1314 11th Street Box 609 Parker, AZ 85344 (602) 669-9265
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Arizona

Colorado River Indian Reservation Community Profile



INTRODUCTION

The Colorado River Indian Reservation lands are located in both La Paz County, Arizona (225,995 acres) and California (42,696 acres) at an elevation of 413 feet. Tribal lands are characterized by low arid desert and fertile river bottom with abrupt mountain ranges. The reservation is spanned north to south by the Colorado River which provides 90 miles of shoreline.

In 1864, Charles Debrille Poston, the first Indian Superintendent for Arizona, selected the area as Arizona's second Indian reservation. The Reservation was established March 3, 1865 for the "Indians of said river and its tributaries". Mohave, Chemehuevi, Hopi, and Navajo Indians now live on the reservation. The Mohave have inhabited the area for centuries while members of the latter tribes relocated to the reservation later.

The incorporated community of Parker, Arizona is located on and surrounded by reservation lands. A second community, Poston, is located on the Reservation 20 miles south of Parker. Much community and economic development has occurred in recent years.

WEATHER

Month	Average Temperature (°F)		Average Total Precipitation (Inches)
	Daily Max	Daily Min.	
January	67.3	37.1	0.53
February	72.9	41.7	0.32
March	78.7	46.6	0.52
April	87.0	53.6	0.22
May	95.3	61.9	0.03
June	103.3	69.6	0.01
July	108.6	78.8	0.30
August	106.7	78.2	0.56
September	102.5	70.2	0.26
October	91.4	57.8	0.29
November	77.5	44.9	0.32
December	68.3	38.1	0.46
Year	88.3	56.5	3.82

Average Total Snow, Sleet and Hail Annually: Trace

Source: Parker Weather Reporting Station, elevation 425 ft.

PRINCIPAL COLORADO RIVER INDIAN RESERVATION ECONOMIC ACTIVITIES

The Reservation economy is largely centered around agriculture, recreation, government and light industry. The fertile river bottom lands and available water are employed extensively in irrigated agriculture producing cotton, alfalfa, wheat, feed grains, lettuce, and melons. Approximately 84,500 acres are now under cultivation and another 50,500 are available for development.

The Colorado River is the basis of a well developed recreation and tourism sector. Marinas, lodging facilities, food and beverage establishments, beaches, mobile home parks, and cabanas have been developed. Recreational development leases and homesite leases are available.

Light industry is expanding on the Reservation. The Colorado River Tribes Industrial Park is fully improved with rail and highway access, paved streets, and complete utilities. The park now has four tenants and the tribes are actively seeking and providing assistance to interested firms.

Arizona
Department of Commerce

State Capitol Tower • 1700 W. Washington • Phoenix, Arizona 85007 (602) 542-5434

COLORADO RIVER INDIAN RESERVATION EMPLOYMENT STRUCTURE

	Percent of Total
Agriculture	14.4%
Commercial - Industrial	1.4
Outdoor Recreation	1.6
Government Employment	73.3
Off-Reservation Employment	9.3

Source: Colorado River Indian Tribe Planning Department

LABOR FORCE DATA	1980	1987	1989
Civilian Labor Force	609	1,079	1,175
Employed	406	615	596
Unemployed	321	464	579
Unemployment Rate	33.3%	43%	49%

Source: Bureau of Indian Affairs, Information Profiles, Colorado River Indian Tribe 1989, Preliminary.

GROWTH INDICATORS

	1986	1987	1988
County Postal Receipts (\$)	670,135	780,836	*441,699
Parker Unified School District	1,950	2,013	2,279
* Parker Postal Receipts			

TAXES

The State of Arizona does not tax Indian lands and Indian-owned property on reservations. Incomes of Indians residing on reservations are not taxed by the State if wholly derived from reservation sources. The Federal Government does not exempt individual Indians from income or other federal taxes. Indian people of Arizona are also exempt from state and local sales taxes on consumer goods purchased on the reservation, unless such taxes are imposed by the tribal government. However, the State of Arizona collects taxes from reservation residents on sales of gasoline, electricity, natural gas, and telephone service. Arizona does tax the property and business transactions of non-Indians who operate on reservations and Indians who live or work off reservations. The current Colorado River property tax rate is \$9.25 per \$100 assessed valuation.

Source: Arizona Property Tax Rates and Assessed Valuation, 1988

POPULATION

	1980	1988	1980-1988 Compound Percentage Change
Colorado River Indian Reservation	2,504	2,411	-0.5%
La Paz County	12,557	14,500	+1.8
Arizona	2,718,215	3,548,400	+3.4

Sources: Arizona Department of Economic Security
U.S. Census Bureau
Colorado River Indian Tribe, Enrollment Department

FINANCE

	<u>Offices</u>		<u>Offices</u>
(Parker)			
Mesa Bank:	1	Desert Sun Bank:	2
Security Pacific:	1	First Interstate Bank	
Valley National Bank:	2	of Arizona	1
First National Bank			
of Arizona:	1		

TRANSPORTATION

Highways:	U.S. 60-70, AZ 72, 95, I-10
Railroads:	Atchison, Topeka and Santa Fe
Bus:	Sun Valley Bus Lines
Truck:	Western Gillette, Milne, Black Mountain, United Parcel Service
Airport:	Avi Suquilla, lighted, 4,800 ft. runway, UNICOM radio, fuel and ground transportation,

COMMUNICATIONS

Newsletter:	Monthly:	Manataba Messenger
Newspapers:	Daily:	Yuma Daily Sun
		Arizona Republic (Phoenix)
	Weekly:	Parker Pioneer
Radio:	KZUL, KMDX-FM, and KFWJ (Lake Havasu City)	
Television:	1 local station (Parker), 11 additional stations from Yuma, Phoenix, Tempe, New York, Atlanta and Connecticut via Cable and Satellite. Includes HBO and ON TV.	

UTILITIES

Electricity:	Bureau of Indian Affairs, and Southern California Edison Co.
Natural Gas:	Southwest Gas Co.
Telephone:	Continental Telephone Co.
Water:	CRIT Regional Water System
Sewer:	Jointly operated by Tribes and Parker

MEDICAL FACILITIES

Hospital:	1 - 20 beds (Laboratory, X-Ray, Emergency Room facilities) Staff - 4 physicians, 1 dentist, 7 community health representatives, 2 field nurses, health educator, sanitarian
-----------	---

Additional medical facilities and services are available in Parker.

GOVERNMENT SERVICES

Tribal Government:	Chairman, Vice Chairman, Council Members
Police Department:	1 Chief, 28 Officers, 5 Support Staff
Fire Department:	27 volunteers
Underwriters Rating:	Grade 6

EDUCATIONAL FACILITIES

	<u>No.</u>	<u>Faculty</u>	<u>Enrollment</u>
Parker Unified School District*	4	114	2,279

La Paz County Public	6	151	2,638
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* All Reservation children attending local public schools attend the Parker Unified School District.

Arizona Western College (in Yuma) and Northern Arizona University (in Flagstaff) offer extension courses at the Parker High School and the Tribal Educational Service Center.

CHURCHES

- 1 Catholic
- 1 Church of Jesus Christ LDS
- 16 Protestant

HOUSING

Current information on housing availability and prices can be obtained from Colorado River Indian Tribes Housing Authority (602) 669-2293.

COMMUNITY FACILITIES

Library-Museum, Aha Quin Mobile Home Park
Irataba Hall and Hatch Center (gyms)
Manataba Park (Baseball diamond, fairgrounds)
Freeman Sharp Community Center
Blue Water Marina (trailer park, beaches, cabanas, picnic area)
PIRA Rodeo Grounds, Veteran's Memorial Baseball Park
12 mile lake Picnic Area
Parker recreational facilities include indoor and outdoor theatres, swimming pool, as well as 5 parks and additional athletic facilities.

AREA SCENIC ATTRACTIONS

The Colorado River, with its dams and huge lakes, is the Reservation's greatest recreational and scenic attraction. Lakes Moovalya and Havasu are formed behind Headgate and Parker Dams. Along the shoreline may be found Bluewater Marina, Aha Quin Park, Buckskin Mountain State Park, beaches, cabanas, and many other facilities available for swimmers, boaters, and water-skiers. Fishing for trout, stripped bass, bass, catfish, crappie and bluegill is excellent in the river and 250 miles of irrigation canal. Dove, quail, waterfowl, rabbit and predator hunting is excellent. Reservation hunting and fishing permits are required. Speed boat, motorcycle and off-road vehicle races are held annually in the area.

The Reservation is part of the traditional homeland of the Mohave and more recently the Chemehuevi. The heritage ties them with the land and their occupation of the area is evidenced by the presence of artifacts and archaeological features. Most notable are petroglyphs, pictographs, ancient trails and intaglios. These are protected and interpreted on the Reservation along with sites from more recent history. The Tribal Museum and Library attempt to preserve and interpret the heritage of each of the four tribes of the Reservation as well as the general pre-history and history of the area. Through the Museum the Tribes maintain two National Historic sites, the Old Mohave Presbyterian Mission and the Old Arizona frontier community of La Paz, Arizona. The Museum and Library and National Historic sites are open to the public. Museum and Library hours are 8 to 5 daily and 10 to 3 on Saturdays.

SPECIAL EVENTS

February	Parker SCORE 400 off road race
March:	La Paz County Fair, National Jet Boat Association races, Parker 7-Hour Enduro-Speed Boat races
April:	Irataba Society Desert Fun Run (10K race), Irataba Society Volleyball Tournament, N.J.B.A. Boat Races
May:	Desert Poker Run-Motorcycle Races, N.J.B.A. Boat Races
June:	River Innertube Race
July:	Independence Day Activities
August:	Jet Ski Races
September:	National Indian Days, Miss Indian Arizona Pageant, N.J.B.A. Boat Races
October:	Arizona State Special Olympics, Parker Rodeo
November:	Pot Pourri Swapmeet, N.J.B.A. Boat Races
December:	All-Indian Rodeo

INDUSTRIAL PROPERTY

Park:	1, 140 acres with all utilities and rail, air and highway access. Contact the Colorado River Indian Tribes Resources Development Committee.
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This profile was prepared in cooperation with the Colorado River Indian Tribes Planning Department.

For further information, contact:

Planning Department
Colorado River Indian Tribes
Rt 1 - Box 23B
Parker, AZ 85344
(602) 669-9211

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APPENDIX E

RECEIVED 08-03-89

89-8-1

RECEIVED:08-03-89

REVIEWED:08-08-89

C.R.I.T. MUSEUM
ARCHAEOLOGIC WALK-OVER PRE-APP. FORM

PROPOSAL:Westates Carbon

TWP: 9N R: 20W SEC: 1

LOCATION: Industrial Park

S/W 1/4 OF S/E 1/4

SUBMITTED BY: Weldon B. Johnson, Sr., Asst. Mus. Dir./Cult.Arch.
THROUGH: Curtiss Martin, Sr., Museum Director

PREVIOUS DESIGNATIONS: A records search of the C.R.I.T. Museum's archaeological files revealed no sites previously recorded at this location.

SITE DESCRIPTION: Site consists of compacted blow sand with creosote, sage and some cholla cactus, ORV impacts also occur at this location.

WALK-OVERS RESULTS: The archaeological walk-over revealed no sites identified.

RECOMMENDATIONS/REMARKS: Due to the absence of cultural material and no sites previously recorded, I recommend waiver of the Cultural Resource portion within the C.R.I.T. L.U.O. 85-2 as amended.

ATTACHMENTS:

February 16, 1990

Ms. Shereen Lerner
State Historical Preservation Officer
State Parks Department
800 W. Washington, Suite 415
Phoenix, AZ 85007

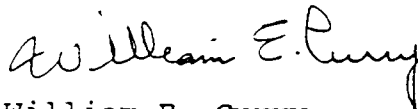
Dear Ms. Lerner:

Engineering Enterprises, Inc. (EEI) has been retained to complete an environmental assessment for the Colorado River Indian Tribes (BIA) on a site near Parker, Arizona. The 11-acre site is located in the SE-1/4 of Section 7, T9N, R19W (see enclosed map) otherwise known as lots 13 and 14 of C.R.I.T. Industrial Park. Westate Carbon will put in a carbon recycling plant at the site location.

The local C.R.I.T. Museum completed an Archeologic Walk-Over on the site on August 8, 1989 (see enclosed copy). A written historical and archeological evaluation of the site is required for our Environmental Assessment. Your timely assistance in this matter will be greatly appreciated.

If you have any questions, please call me at 405/329-8300.

Yours truly,



William E. Curry
Staff Hydrogeologist
C.P.G. 6532

WEC:ns

Enclosures

November 29, 1990

Wilson Barber, Area Director
DOI Bureau of Indian Affairs
Phoenix Area Office
P.O. Box 10
Phoenix, AZ 85001

ATTN: C. Randall Morrison

RE: Colorado River Indian Reservation, Westates Carbon Regeneration Lease,
DOI-BIA/PAO

Dear Mr. Barber:

Thank you for notifying us about the above project and sending us a copy of the cultural resources documentation prepared by Weldon Johnson from the CRIT Museum. I have reviewed the documentation that you submitted and have the following comments pursuant to 36 CFR Part 800:

1. The documentation that was submitted is not consistent with the Secretary of the Interior's standards for archaeological inventories and we request that future surveys be more consistent with these standards and presented to us in a format per our memorandum of February 5, 1988 to all Federal agencies and consulting archaeologists.
2. Regardless, we have no reasons to doubt Mr. Johnson's findings and note that he did not locate any cultural material.
3. Therefore, we concur with the agency that this project should have no effect on any National Register or eligible properties.
4. One conditional comment is that should archaeological remains be encountered during project ground disturbing activities, work should cease in the area of the discovery and this office be notified immediately, pursuant to 36 CFR 800.11.

We appreciate your continued cooperation with this office in complying with the historic preservation requirements for federally assisted undertakings. If you have any questions, please contact me.

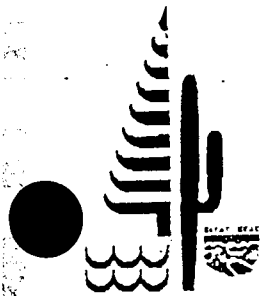
Sincerely,

Robert E. Gasser
Compliance Coordinator

for Shereen Lemer, Ph.D.
State Historic Preservation Officer



450



ARIZONA STATE PARKS

800 W. WASHINGTON
SUITE 415
PHOENIX, ARIZONA 85007
TELEPHONE 602-542-4174

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GOVERNOR

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M. JEAN HASSELL
STATE LAND COMMISSIONER

KENNETH E. TRAVOUS
EXECUTIVE DIRECTOR

COURTLAND NELSON
DEPUTY DIRECTOR

BUREAU OF INDIAN AFFAIRS
RECEIVED
DEC 4 12 56 PM '90
PHOENIX AREA DIRECTOR

APPENDIX F



NOV 30 1990

*Colorado River
Sewage System
Joint Venture*

Post Office Box 628
Parker, Arizona 85344
(602) 669-9821

November 5, 1990

Robert A. Shapiro, PhD
Simon EEI, Inc.
1225 West Main
Norman, OK. 73069

Dear Dr. Shapiro:

Please be advised, that this office and our consulting engineers, have made a preliminary review of the plans of WESTATES CARBON to discharge certain industrial wastes into the sewer system managed by THE COLORADO RIVER SEWAGE SYSTEM JOINT VENTURE. We anticipate we will be able to accommodate this flow without significant impact on our system.

The Joint Ventures current operating flow is approximately 75% of it's maximum flow capacity of 800,000 gallons per day. Therefore, the expected 18,700 gallons per day (13 gpm) incremental flow increase contributed by the WESTATES CARBON facility will be less than 3% of our capacity. At this level, the waste stream flow will not have a significant impact on our system.

Westates Carbon has been notified by our office that as an industrial user of the system that they will be required to obtain an "Industrial Wastewater Discharge Permit" prior to being allowed to discharge into the Sewer System. This permit will control the mechanical design of their tie-in into the main sewer line. This permit also states that:

1. No person shall discharge or cause the discharge any waste water which may have an adverse harmful effect on the Joint Venture Sewage Treatment Plant.
2. Users shall provide necessary waste water pretreatment as required to comply with this resolution and shall achieve compliance with all Federal Categorical Pretreatment Standards.

Westates Carbon is aware of the conditions under which the "Industrial Wastewater Discharge permit" is issued and is aware of the two conditions previously stated above.

The Joint Venture has adequate monitoring and enforcement control to assure that the Westates plant will discharge wastewater into the Sewage System in accordance with the system's standards and operating conditions.

Page Two

We hope this information will be helpful to you in your assessment. If you have any questions concerning this matter please contact the Joint Venture office at (602-669-9821).

Sincerely,

Robert C. Garcia

Robert C. Garcia
General Manager

RCG/raa

cc: Conner Byestewa, C.R.I.T., E.P.A.
Board of Directors
Daniel Eddy Jr., Chairman C.R.I.T.
Jeff Nolte, I.H.S.

APPENDIX G



**SUMMARY OF PUBLIC
and AGENCY CONTACTS**

A.

PUBLIC CONTACTS

During May, June and July of 1989, Mr. Don Jacobson of the Arizona Department of Commerce assisted Westates Carbon, Inc. in selecting potential sites for a proposed carbon reactivation facility. During this period, Mr. Jacobson accompanied Westates' Mr. Babbitt on a week long visitation to several selected communities in western Arizona. Together they meet town officials, regional environmental agencies, and local citizen groups for the purpose of explaining the nature of Westates' spent carbon reactivation business and extent of major environmental issues involved. In every one of these meetings, after appropriate question and answer sessions, each community expressed enthusiasm to continue negotiations with Westates to locate in their area.

Through this effort, Westates selected Parker, Az. as the most desirable community within which to pursue negotiations for site development. It was at this time that Westates was introduced to the economic development principals of Parker, Az.

In addition to site selection, Mr. Jacobson has been helpful to Westates Carbon over the ensuing several months of project development by providing contacts for project funding at both the State level and in La Paz County. Also, Mr. Jacobson has been helpful to Westates by providing an introduction route to Senator John McCain's office; which has an official interest in the economic development on Indian Reservation lands.

<u>DATE</u>	<u>CONTACT</u>	<u>PARTICIPANTS</u>	<u>MAJOR ISSUES DISCUSSED</u>
5/16/89	Initial Westates contact with CRIT.	CRIT, Billy Taylor WESTATES, Bob Babbitt PARKER, Chamber of Commerce- Dottie Randall	Project scope and site availability.
6/1/89	Introduction of Westates to CRIT officials.	CRIT E. Booth-Tribal Council C. Byestewa-Environmental R. Moore-Planning B. Taylor-Commercial Dev. WESTATES B. Babbitt	This half day meeting was primarily a discussion of project scope, nature of spent carbon hazardous waste characteristics, environmental permitting requirements and utility availability.

<u>DATE</u>	<u>CONTACT</u>	<u>PARTICIPANTS</u>	<u>MAJOR ISSUES DISCUSSED</u>
6/12/89	CRIT-Resource Development Committee (RDC) meeting. → first business meeting regarding Westates open to public.	RDC Committee, Westates officials, BIA representative and other interested parties. RDC meeting minutes indicate an attendance of 16 individuals.	Verbal presentation Westates of project scope and environmental issues. Copies of the environmental impact documentation associated with the Permit issued by Arizona DEQ for operation in Mohave County were distributed to RDC members. Discussion followed regarding Tribal authority in the permitting process.

action: RDC voted to continue business discussions. The Tribe also voted to conduct investigations into Westates' environmental compliance history in California by contacting EPA, OSHA, L.A. Sewer Dist., L.A. Fire Dept. and other appropriate agencies. The issue of non-storage hazardous carbon reactivation under federal permit requirements was to be specifically verified with EPA.

On 7/17/89 Westates' President and Project Manager, along with B. Taylor representing CRIT, met with PARKER officials to announce the opening of negotiations regarding the carbon reactivation facility. The Mayor of the Town of Parker (Roberta Hoffman), the Chairman of the La Paz County Board of Supervisors (Gene Fisher) and the Executive Director of the Parker Chamber of Commerce (Dottie Randall) were given a verbal presentation at this dinner meeting regarding the project scope and environmental issues. Company literature and abstracts of the environmental impact documentation associated with the Permit issued by Arizona DEQ were distributed to the individuals present.

<u>DATE</u>	<u>CONTACT</u>	<u>PARTICIPANTS</u>	<u>MAJOR ISSUES DISCUSSED</u>
8/10/89	CRIT Field Trip visiting Westates facilities in Los Angeles.	CRIT delegation and representative of BIA-Indian Health Services. There were six representatives total.	Tour of the two Westates facilities in Los Angeles and introduction to the Westates' Managers and staff. Discussions included local compliance history and the laboratory capabilities for environmental monitoring, hazardous constituent identification methods and product quality control.

On 10/4/89 a newspaper article was published in one of the local Parker newspapers, the PARKER PIONEER (see Appendix I). This announcement was based upon interviews with spokesman from CRIT and Westates. Coverage of the plans for Westates to locate a new carbon reactivation facility in Parker was also provided by the local T.V. news station.

<u>DATE</u>	<u>CONTACT</u>	<u>PARTICIPANTS</u>	<u>MAJOR ISSUES DISCUSSED</u>
10/11/89	Special Tribal Council Meeting → second meeting regarding Westates which is open to public participation.	CRIT; Tribal Council & RDC. WESTATES; President & Project Manager. ARIZONA DEQ; P. Scheidig JOINT VENTURE; General Mngr. BIA; representatives from PO Superintendent, Operations, & Real Estate offices. OTHERS; individuals from both inside and outside the Tribal community. Council minutes list over 30 individuals in attendance at this meeting.	Westates presented it's proposal to build a carbon reactivation facility on acreage located within the CRIT Industrial Park. The presentation included photo slides, exhibits and drawings as examples of existing facilities, types of transport containers, operating conditions, types of spent carbon classified as hazardous waste material, number and types of employees required, and other business issues. Representative from ADEQ then described how his agency had reviewed the environmental impacts of the Westates operation for the Kingman, Az. area. He explained that air emissions, waste water discharges, and hazardous waste management issues were investigated by appropriate departments within the agency. Finding public environmental concerns being satisfactorily answered, State discharge standards being met, and no other State environmental issues being of concern, gave the agency resolve to issued a Permit allowing construction and operation commencement.

DATECONTACTPARTICIPANTSMAJOR ISSUES DISCUSSED

He mentioned that because the Kingman area is substantially similar to Parker that the State would encourage Permitting the proposed facility in Parker.

ADEQ expressed interest to form an Inter-Agency Agreement with CRIT for any environmental monitoring necessary under CRIT law.

Representative from JOINT VENTURE described the capabilities and limitations of the sewer system to handle the proposed Westates' industrial waste discharge.

action: The meeting minutes reflect that during this half day presentation many questions covering environmental, social and business issues were raised. The council voted to continue discussions with Westates and to open commercial negotiations.

11/9/89

Opened commercial negotiations using outside legal expert.

CRIT;RDC members and outside legal counsel. WESTATES; President, Project Mngr., and legal counsel.

In addition to the business aspects discussed in this meeting, it was agreed that Westates would retain an Environmental Consultant to conduct an annual environmental audit of it's operations.

DATECONTACTPARTICIPANTSMAJOR ISSUES DISCUSSED

1/12/90

Tribal Council Meeting selecting an Environmental Consultant to prepare an ENVIRONMENTAL ASSESSMENT document.

→ third meeting regarding Westates which is open to public participation.

Council members, RDC, BIA representative and other interested parties.

There were an estimated 12 to 17 individuals present at this meeting based upon meeting minutes.

Proposals by contacted firms authorized by BIA to perform environmental assessments were reviewed. Engineering Enterprises, Inc. was present to make a presentation of qualifications.

action: Tribal Council approved Resolution #10-90 (see Appendix A) announcing the continuation of negotiations with Westates regarding a land lease proposal and approving the selection of Engineering Enterprise, Inc. as environmental consultant to prepare an ENVIRONMENTAL ASSESSMENT for the proposed project.

NOTE: The February issue of the Tribal newspaper (MANATABA MESSENGER) made note by brief summary of Council action.

3/16/90

Special Tribal Council meeting to consider presentation of draft EA document.

→ fourth meeting regarding Westates which is open to public participation.

Council members, RDC, Engineering Enterprise, Inc, BIA representative, Westates and other interested parties.

Meeting minutes indicate that 26 individuals were in attendance.

EEI outlined the environmental issues studied in preparing the ENVIRONMENTAL ASSESSMENT document. They indicated that much of the process technical information used in preparing the EA was taken from documents approved by ADEQ and that other Parker area environmental issues were solicited from the federal, state and local agencies concerned. Issues of concern during construction as well as during operations were examined as part of the study. Possible steps to mitigate potential environmental problems as listed in the EA document were pointed out to the audience.

DATECONTACTPARTICIPANTSMAJOR ISSUES DISCUSSED

The meeting minutes show that a question and answer period followed the discussions with many questions being asked of EEI and of Westates. Editorial changes and BIA input to the EA document were requested by the Council.

5/10/90

Special Tribal Council meeting to approve commercial lease with Westates.

→ fifth meeting regarding Westates which is open to public participation.

Council members, Westates representative and other interested parties.

There were approximately 20 individuals present at this special Saturday meeting. This was a Tribal election day and economic development was a major campaign issue.

There were no further discussions nor questions regarding the lease agreement, there were only editorial changes noted.

action: Tribal Council approved Resolution #101-90 (see Appendix ?) approving business lease agreement with Westates; approval being contingent upon Council acceptance of Final EA document and BIA approval of lease agreement.

NOTE: The June issue of the Tribal newspaper (MANATABA MESSENGER) made note by brief summary of Council action.

<u>DATE</u>	<u>CONTACT</u>	<u>PARTICIPANTS</u>	<u>MAJOR ISSUES DISCUSSED</u>
7/6/90	Special Tribal Council meeting to consider Final EA document. → sixth meeting regarding Westates which is open to public participation.	Council members, RDC, EEI, BIA representative and other interested parties. There were an estimated 14 to 19 individuals present at this meeting based upon meeting minutes.	There were no further discussions nor modifications regarding the EA document.

action: Tribal Council approved Resolution #146-90 (see Appendix A) approving EA document.

NOTE: Tribal newspaper service has been discontinued.

10/12/90	Tribal Council meeting. → seventh meeting open to public participation in which Westates lease proposal was discussed.	Council members, RDC, and other interested parties. There were an estimated 15 to 20 individuals present at this meeting.	Request for information on status of BIA approval of lease agreement.
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Copies of letters solicited from PARKER officials on January 11, 1991 are attached. The Mayor of the Town of Parker (Roberta Hoffman), the La Paz County Board of Supervisors (represented by the ex-Chairman Gene Fisher) and the Executive Director of the Parker Chamber of Commerce (Dottie Randall) have all given statements of early project knowledge, interest in the progress of lease negotiations, and have expressed continued support for the project.

B. AGENCY CONTACTS

1. United States Environmental Protection Agency

a. August - October, 1989

Repeated discussions between CRIT and EPA Region IX regarding federal permitting requirements. Contacts were initiated through the Indian Services Coordinator, and resulted in verbal assurances that the project required no federal permits. EPA based its conclusion on analysis, performed by permitting personnel in the RCRA, Clean Air Act, FWPCA, and groundwater areas, of data generated for the draft EA and for state permit requirements related to a planned carbon regeneration facility in Kingman, Arizona.

b. August - September, 1990

EPA Region IX, under the direction of Jacqueline Wyland, Chief, Office of Federal Activities, performs a comprehensive review of the draft EA at the request of BIA. This review results in the submission of comments to BIA (see Appendix C), which are addressed in the Final EA. Impact data is further reviewed by the Permits and Solid Waste Branch, resulting in a letter to Westates confirming the status of the proposed project as a recycling facility exempt from RCRA permitting requirements (see Appendix C).

2. Arizona Department of Environmental Quality

a. October, 1988 - April, 1989

ADEQ performs detailed review, in connection with permits sought by Westates for a planned carbon regeneration facility in Kingman, Arizona, of a Notice of Intent to Construct and other documents containing environmental impact data largely identical to that incorporated into the draft EA. All necessary construction permits, including an air permit, are issued (see Appendix D). Kingman project eventually abandoned in favor of the Parker site.

b. October 11, 1989

Pursuant to an agreement between CRIT and ADEQ that the Tribe would draw on the Department's environmental expertise in assessing the proposed project, Mr. Paul Scheidig, Ombudsman for ADEQ, gives a presentation in a public meeting before the Tribal Council on the project's potential impacts and their relation to state environmental concerns. Based on ADEQ's review of the substantially similar Kingman site impact data, Mr. Scheidig endorses the proposed Parker project as compatible with

state environmental standards. A letter from Mr. Scheidig to CRIT containing a similar endorsement is attached (see Appendix D).

3. United States Fish and Wildlife Service

a. February - March, 1990

U.S. Fish and Wildlife Service reviews potential habitat and wildlife impacts. Based on correspondence from EEI describing the nature of the proposed project, including site identification and scope of construction, Gilbert Metz, Acting Field Supervisor, submits a letter to EEI indicating that no listed species would be affected by the proposed action (see Appendix E).

4. Arizona Game and Fish Department

a. February - March, 1990

Arizona Game and Fish Department reviews potential habitat and wildlife impacts. Based on similar correspondence to that described above, David Walker, Habitat Evaluation Coordinator, submits a letter to EEI identifying areas of concern, which are addressed in the Final EA, and concludes that the Service does not anticipate significant adverse impacts to wildlife resources from development of the site (see Appendix F).

5. Arizona State Parks Department

a. March, October - November, 1990

Arizona State Parks Department reviews potential impacts on the socio-cultural environment. Based on correspondence from EEI identifying the nature and site of the proposed project, verbal contacts, and the results of the CRIT museum's archeological walk-over, Robert Gasser, Compliance Coordinator, under the direction of Dr. Shereen Lerner, State Historic Preservation Officer, submits a letter to BIA indicating that the project is not expected to effect any National Register or eligible properties (see Appendix G).

6. Colorado River Sewage System, Joint Venture

a. February - November, 1990

The CRSS, Joint Venture is a municipal wastewater treatment plant jointly owned and operated by CRIT and the town of Parker. Contacts include repeated correspondence, telephone contacts, and at least four face-to-face meetings between Westates or EEI and Robert Garcia, General Manager, and/or his technical representative. Discussions focus on the impact of

wastewater from the proposed facility on the Joint Venture system and compliance with pre-treatment requirements. As a result of these contacts, the Joint Venture submits a letter to EEI stating that it anticipates being able to accomodate wastewater from the proposed project without significant impact to the system (see Appendix H).

7. Arizona Secretary of State

a. August - September, 1990

Pursuant to Westates' application for incorporation in the State of Arizona, the Secretary of State conducts an investigation of Westate's officers to determine whether they have been involved in any criminal/environmental offenses. The results of this investigation are negative, and the request for incorporation granted.

8. Other Contacts

Contacts with the Arizona Department of Transportation, Bureau of Land Management, Parker Regional Airport, USDA Soils Section, U.S. Bureau of Reclamation, and U.S.G.S. Water Resources occurred between February and July, 1990, and are in the nature of requests for information by EEI. This information, which includes data on area population, traffic patterns, hydrogeology, weather characteristics, flora and fauna listings, and soil maps and characterization studies, is incorporated into the draft EA. Through correspondence and verbal contacts, EEI informs each of these agencies of the nature and site of the proposed facility and of Westates' identity. Robert Shapiro, Project Manager at EEI, states that none of the agencies contacted have expressed any opposition to the proposed project.



APPENDICES



CONTENTS

- Appendix A** **List of dates of meetings between the Tribal Council and Westates.**
- Tribal Council Resolutions #10-90, 101-90, and 146-90.**
- Appendix B** **Letter from Roberta Hoffman, Mayor, Town of Parker to Wilson Barber, Area Director, BIA, dated January 11, 1991.**
- Letter from Dorothy Randall, Executive Director, Parker Area Chamber of Commerce to Wilson Barber, Area Director, BIA, dated January 11, 1991.**
- Appendix C** **Letter from Jacqueline Wyland, Chief, Office of Federal Activities, EPA Region IX, to Barry Welch, Active Area Director, BIA, dated Sept. 20, 1990.**
- Letter from Michael Feeley, Chief, Permitting and Solid Waste Branch of EPA Region IX to Robert Babbitt, Project Manager, Westates Carbon, dated October 18, 1990.**
- Appendix D** **Letter from Paul Scheidig, Ombudsman, ADEQ to Elliott Booth, Vice Chairman, CRIT, dated September 12, 1989.**
- State of Arizona installation permit for Westates' planned facility in Kingman, Arizona.**
- Appendix E** **Letter from Gilbert Metz, Acting Field Supervisor, U.S. Fish and Wildlife Service to William Curry, Staff Hydrogeologist, EEI, dated March 1, 1990.**
- Appendix F** **Letter from David Walker, Habitat Evaluation Coordinator, Arizona Game & Fish Department to William Curry, Staff Hydrogeologist, BIA, dated March 8, 1990.**

Appendix G

Letter from Robert Gasser, Compliance Coordinator, Arizona State Parks to Wilson Barber, Area Director, BIA, dated November 29, 1990.

Appendix H

Letter from Robert Garcia, General Manager, Colorado River Sewage System, Joint Venture to Robert Shapiro, Project Manager, EEI, dated November 5, 1990.

Appendix I

Article dated October 4, 1989 from the Parker Pioneer.

APPENDIX A

RECEIVED JAN 11 1991

Office Memorandum OF THE COLORADO RIVER INDIAN TRIBES

TO: Barbara
Billy Taylor, Commercial Manager

DATE: January 11, 1991

FROM: Word Processing Department

SUBJECT: Research - Tribal Council Meeting dates re Westates

Pursuant to your telephone request, the Tribal Council minutes index was researched and the dates of the meetings when Westates was discussed are as follows:

October 11, 1989	July 06, 1990
January 12, 1990	July 13, 1990
January 24, 1990	July 14, 1990
March 16, 1990	October 12, 1990
May 10, 1990	
May 11, 1990	

Please note that due to the tremendous increase in Tribal Council meetings called in 1990, there remains some unfinished minutes, which may include discussion of Westates.

RESOLUTION **COLORADO RIVER TRIBAL COUNCIL**

A Resolution to ~~Approve an Agreement with Westates Carbon, Inc.~~
Be it resolved by the Tribal Council of the Colorado River Indian Tribes, in ^{Special} ~~regular~~ meeting assembled
on January 24, 1990

WHEREAS, the Tribe is considering a proposal from Westates Carbon, Inc., to locate a business on the Reservation to service activated carbon pollution control devices; and

WHEREAS, the Tribe is in need of expert analysis of the potential environmental impacts, present and future, of the proposed project; and

WHEREAS, Westates Carbon, Inc., has agreed to pay the costs of such environmental expert to facilitate consideration of this proposal:

NOW, THEREFORE, BE IT RESOLVED that the Tribal Council approves entering into the attached Agreement for Payment of Environmental Review Costs between the Tribe and Westates Carbon pursuant to the terms and conditions thereof; and

BE IT FINALLY RESOLVED that the Tribal Council Chairman and Secretary, or their designated representatives, are authorized to execute any documents necessary to implement this action.

The foregoing resolution was on January 24, 1990 duly approved by a vote of
5 for, 0 against and 0 abstaining, by the
Tribal Council of the Colorado River Indian Tribes, pursuant to authority vested in it by Section
1.2. Article VI of the Constitution and By laws of the Tribes,
ratified by the Tribes on March 1, 1975 and approved by the Secretary of the Interior on May 29, 1975,
pursuant to Section 16 of the Act of June 18, 1934, (48 Stat. 984). This resolution is effective as of the
date of its adoption.

COLORADO RIVER TRIBAL COUNCIL

By

Daniel Eddy
Chairman
Lawanda Laffoon
Secretary

Post

Resolution No. 101-90

RESOLUTION
COLORADO RIVER TRIBAL COUNCIL

A Resolution to Approve a Modified Agreement with Westates-Arizona, Inc.

Be it resolved by the Tribal Council of the Colorado River Indian Tribes, in ^{SPECIAL} ~~regular~~ meeting assembled
on May 11, 1990

WHEREAS, by Resolution No. 72-90, the Tribe approved a business lease with Westates-Arizona, Inc.; and

WHEREAS, the Tribe and Westates have agreed to modifications of the business lease approved by Resolution No. 72-90:

NOW, THEREFORE, BE IT RESOLVED that Tribal Council approves the attached Westates-Arizona, Inc. Business Lease which contains modifications as follows:

1. Paragraph 7.1.3(D) has been modified adding the words "for similarly situated properties." after the words "value method"; and
2. Paragraph 7.5.1 has been modified by deleting the words "and installation" after the words "water filter equipment"; and
3. Paragraph 8.3 has been modified by moving the last two sentences to the end of Paragraph 11.2
4. Paragraph 11.2 has been modified by replacing the words "and repairs for ordinary wear and tear" with the words ", with ordinary wear and tear excepted," and by moving the last two sentences of Paragraph 8.3 to the end thereof; and
5. Paragraph 19.11 was amended by changing places where the words "120 days" appears and replacing it with the words "180 days"; and

The foregoing resolution was on May 11, 1990 duly approved by a vote of
4 for, 1 against and 0 abstaining, by the

Tribal Council of the Colorado River Indian Tribes, pursuant to authority vested in it by Section
1.a. Article VI of the Constitution and By laws of the Tribes,
ratified by the Tribes on March 1, 1975 and approved by the Secretary of the Interior on May 29, 1975,
pursuant to Section 16 of the Act of June 18, 1934, (48 Stat. 984). This resolution is effective as of the
date of its adoption.

COLORADO RIVER TRIBAL COUNCIL

By

David Elbert
Chairman

Lawanda Laffoon
Secretary

6. Paragraph 23.3 was modified by replacing the words ", unless LESSEE is unable to reasonably attain, at any point during the Lease term, insurance in such amount, but in no event less than \$1,000,000." with the words "If LESSEE is unable to obtain insurance in such amount, LESSEE will use reasonable efforts to obtain the maximum pollution insurance coverage available and provide evidence of its efforts to LESSOR, but in no event less than \$1,000,000. Should increased insurance coverage become available up to the \$3,000,000 amount, or such amount established pursuant to Paragraph 25, LESSEE shall immediately increase its insurance to such amount."; and

7. Adding a new Paragraph 30.8 as follows:

"30.8 Emergency Response Plan.

LESSEE agrees to submit to LESSOR a draft emergency response plan not less than one hundred twenty (120) days and a final emergency response plan not less than thirty (30) days prior to the anticipated date for starting operations of the carbon reactivation facility. LESSOR agrees to provide comments on the draft emergency response plan to LESSEE with sixty (60) days of submission of the draft emergency response plan to LESSOR. The emergency response plan shall meet the requirements of Subparagraph 30.3."; and

8. Adding a new Paragraph 38.2 as follows:

"38.2 Worker Safety.

LESSEE agrees to submit to LESSOR a draft worker safety plan not less than ninety (90) days and a final worker safety plan not less than thirty (30) days prior to the anticipated date for starting operations of the carbon reactivation facility. LESSOR agrees to provide comments on the draft worker safety plan to LESSEE within forty-five days of submission of the draft worker safety plan to LESSOR. The worker safety plan shall meet the requirements of the Occupational Safety and Health Act of 1970 (29 U.S.C. §§ 651 et. seq.), as amended, including regulations promulgated thereunder. During the Primary Term and Renewal Term, the worker safety plan shall be amended to meet the requirements of applicable law." and

BE IT FINALLY RESOLVED that the Tribal Council Chairman and Secretary, or their designated representatives, are hereby authorized to sign any and all documents necessary to implement this action.

Post

Resolution No. 146-90

RESOLUTION
COLORADO RIVER TRIBAL COUNCIL

A Resolution to Approve the Environmental Assessment for the Westates
Carbon-Arizona, Inc., Plant Special
Be it resolved by the Tribal Council of the Colorado River Indian Tribes, in regular meeting assembled
on July 13, 1990

WHEREAS, the Tribe by Resolution Nos. R-72-90 and R-101-90 approved a lease for a carbon reactivation plant; and

WHEREAS, the lease required approval by the Tribe of an environmental assessment of the carbon reactivation operations to be conducted on the leased premises; and

WHEREAS, Engineering Enterprises, Inc., has prepared an environmental assessment of the operations to be conducted by lessee and has presented its conclusions to the Tribe;

NOW, THEREFORE, BE IT RESOLVED that the Tribal Council hereby accepts the attached "Environmental Assessment, Carbon Reactivation Plant, Parker, Arizona, Colorado River Indian Tribes March 1990" (revised July 3, 1990) prepared by Engineering Enterprises, Inc., and

BE IT FINALLY RESOLVED that the Tribal Council Chairman and Secretary, or their designated representatives are authorized to execute any documents necessary to implement this action.

The foregoing resolution was on July 13, 1990 duly approved by a vote of
7 for, 0 against and 0 abstaining, by the
Tribal Council of the Colorado River Indian Tribes, pursuant to authority vested in it by Section
1.2. Article VI of the Constitution and By laws of the Tribes,
ratified by the Tribes on March 1, 1975 and approved by the Secretary of the Interior on May 29, 1975,
pursuant to Section 16 of the Act of June 18, 1934, (48 Stat. 984). This resolution is effective as of the
date of its adoption.

COLORADO RIVER TRIBAL COUNCIL

By

Daniel Esby Jr.
Chairman

Lawanda Laffoon
Secretary



APPENDIX B



TOWN OF PARKER

1314 11TH STREET • POST OFFICE BOX 809 • PARKER, ARIZONA 85344 • (602) 669-9265

January 11, 1991

Mr. Wilson Barber, Area Director
Bureau of Indian Affairs
P. O. Box 10
Phoenix, AZ 85007

Dear Mr. Barber:

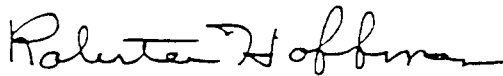
On July 17, 1989, I attended a presentation meeting given by Westates Carbon. The purpose of this meeting was to explain the process that would be used in their operation, to explain environmental and social implications, and other pertinent matters.

We were made aware that the State of Arizona had issued a Permit to Construct based upon a review of air emissions in regards to all the other appropriate State permitting requirements.

Since that time, we have also been kept apprised through the Joint Venture Sewer Board, the Chamber of Commerce and the Colorado River Indian Tribes Chairman, Daniel Eddy, Jr.

Sincerely yours,

TOWN OF PARKER



Roberta Hoffman
Mayor

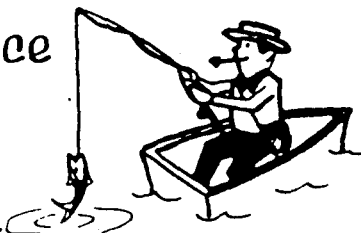
RH:djh

Parker Area Chamber of Commerce

P.O. BOX 827
PARKER, ARIZONA 85344

1217 CALIFORNIA AVENUE
TELEPHONE (602) 689-2174

LA PAZ COUNTY



'Enjoy Life on the Colorado River'

January 11, 1991

Mr. Wilson Barber,
Area Director
Bureau of Indian Affairs
Area Office
PO Box 10
Phoenix, Az 85007

Dear Mr. Barber:

We are pleased to advise you that Westates Carbon Company has kept in close contact with our Chamber of Commerce, since early in 1989.

We had the pleasure of showing the Colorado River Indian Tribes Industrial Park to Mr. Bob Babbitt, Project Manager for Westates Carbon, upon his first visit to the Parker area.

In July of 1989, I met with Dr. Allen Sass, President of Westates Carbon, along with Roberta Hoffman, Mayor of the Town of Parker, Mr. Billy Taylor, Commercial/Industrial Director for the Tribes and Mr. Gene Fisher, Supervisor for LaPaz County. Mr. Babbitt was also with us for this dinner meeting, at which time Mr. Sass and Mr. Babbitt explained their company structure, need for additional facilities and how they process their product. Mr. Sass showed our group a letter their firm had received from the Arizona Department of Environmental Quality which stated the Arizona DEQ would have no problem in issuing a permit to them in the Parker area for their process, considering it would be built and operated in the same manner as the application made for Kingman, Arizona.

Mr. Ron Moore, Director of Development for the Tribe and Mr. Billy Taylor both serve on our Chamber of Commerce Economic Development Committee and have kept our committee members informed on the process of Westates Carbon in seeking a lease from the Tribes in their Industrial Park.

WHEN IN THE PARKER AREA, BE SURE TO SEE . . .

- ★ PARKER DAM . . . The World's Deepest Dam
- ★ BUCKSKIN MT. STATE PARK . . . Boating, camping, fishing, & skiing in a scenic mountain setting
- ★ LA PAZ COUNTY PARK . . . 640 acres of outdoor and water recreation
- ★ THE COLORADO RIVER INDIAN TRIBAL COUNCIL CHAMBERS, LIBRARY AND MUSEUM
- ★ JOIN US FOR THE . . . Parker Enduro, Score 400, Innertube Race, and other annual events

Mr. W. Barber

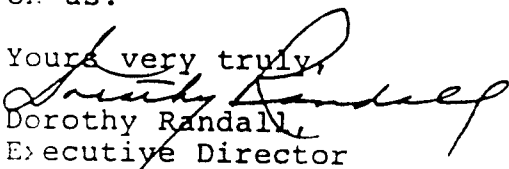
Jan 11,

-2-

We are looking forward to the ground breaking of Westates Carbon and feel that with this firm locating in the Industrial Park it will encourage other manufacturing firms who may be interested in locating in the Industrial Park on the Colorado River Indian Reservation and bring additional employment opportunities for area residents.

If we may be of assistance in anyway with your review of Westates Carbon, we would be most pleased to have you call on us.

Yours very truly,


Dorothy Randall,
Executive Director

DR/lis

SV
Army

450

A circular ink stamp from the Phoenix Area Office, Environmental Services. The outer ring contains the number sequence "15671819202122232425262728293031-1234567". The center of the stamp features the date "JAN 1991" at the top, followed by "RECEIVED" in large bold letters, "PHOENIX AREA OFFICE" below it, and "ENVIRONMENTAL SERVICES" at the bottom. A handwritten signature or initials are visible across the top portion of the stamp.

Dear Mr. Barber,

The meeting was at the Blue Water Deli. Dr. Sass and Mr. Babbitt discussed Westates desire to move to Parker and have their business on the Colorado River Indian Reservation. The number of employees and the types of jobs were discussed.

If I can answer any other questions for you please
call me at 602-662-4806.

Gene Fisher

BUREAU OF INDIAN AFFAIRS
OFFICE OF THE
JAN 10 11 42 AM '91
PHOENIX ARIZ DIRECTOR

JAN 22 1991



APPENDIX C



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103

20 SEP 1990



Mr. Barry W. Welch
Acting Area Director
Bureau of Indian Affairs
Phoenix Area Office
P.O. Box 10
Phoenix, AZ 85001

Dear Mr. Welch:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Assessment (DEA) for the **Carbon Reactivation Plant, Parker, Arizona**, pursuant to the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEA proposes leasing of Colorado River Indian Tribal land in Parker, Arizona, for construction and operation of a carbon regeneration plant to be owned and operated by Westates Carbon, Inc. Approximately 20 percent of the carbon treated at the plant would contain hazardous waste.


EPA cannot ascertain from the information provided in the DEA whether a Part B Resource Conservation and Recovery Act (RCRA) permit would be required for the Westates facility. Nor can we determine whether a Prevention of Significant Degradation (PSD) permit would be required. We recommend that Westates request formal determinations from EPA regarding the need for these two permits. We also request that the Final Environmental Assessment (FEA) include additional information regarding impacts to water quality, wildlife, and noise. Our specific comments are attached.

We appreciate the opportunity to comment on the proposed project. If you have any questions, please contact me at (415) 556-5113, or have your staff contact Jeanne Dunn at (415) 556-5104. Please note that on October 4, we will be moving our

BUREAU OF INDIAN AFFAIRS
PHOENIX AREA OFFICE
SEP 24 11 36 AM '90
PHOENIX AREA DIRECTOR

office to 75 Hawthorne Street, San Francisco, California, 94105.
After that date, you may contact me at 744-1584 or Ms. Dunn at
744-1576.

Sincerely,



Jacqueline Wyland, Chief
Office of Federal Activities

Enclosure

cc: Amy Heuslein, BIA
Daniel Eddy, Chairman C.R.I.T.
Bob Babbit, Westates Carbon, Inc.
Sam Perkins, Steptoe & Johnson
Roccena Lawatch, EPA OPINAP

General Comments

The statement that the proposed site was selected as being the most environmentally attractive alternative is not substantiated in the DEA (page 2-26). Discussions of other sites that were evaluated focus on the economic or social issues related to those sites but do not address environmental factors involved in site selection. If environmental factors were evaluated in selecting the proposed site over other alternative sites, the FEA should discuss these factors.

Resource Conservation and Recovery Act

1. The DEA indicates that the regeneration of spent carbon is considered to be recycling and is conditionally exempt from Resource Conservation and Recovery Act (RCRA) regulations. At this time, EPA cannot make a determination on the regulatory status of the Westates facility based on information provided in the DEA. Additional information from Westates will be necessary in order for EPA to make this determination. We recommend that Westates request from EPA an official determination of RCRA status for the facility and coordinate with Mr. Larry Bowerman, Chief, Alternative Technology Section, EPA Region 9. This determination could take four to six weeks. If it is determined that a RCRA permit is required, the permitting process could take up to two years.

For your information, in a proposed rule published in the April 27, 1990, Federal Register, EPA determined that "controlled flame carbon regeneration units currently meet the definition of incinerator and have been subject to regulation as such since 1980, while carbon regeneration nonflame units have been treated as exempt reclamation units." In the same proposed rule, however, EPA has proposed to regulate both direct flame and nonflame carbon regeneration units as thermal treatment units under the interim status standards of 40 CFR Part 265, Subpart P, and the permit standards of 40 CFR 264, Subpart X. EPA is concerned that emissions from these devices may present a substantial hazard to human health and the environment if they are not controlled. The proposed rule is expected to be promulgated by mid- to late 1991.

Further, the Subpart X regulations are not specific and leave many of the permitting process decisions up to the individual EPA regions. Should EPA need to evaluate a Part B application and write a permit for this facility in the future, we anticipate that the standards used would be similar to those used for hazardous waste incinerator projects (40 CFR 264 Subpart O). These

standards include a Part B application with detailed design specifications for the equipment, a detailed Risk Assessment for the project using current EPA toxicological values, emissions estimates based on the known emissions from similar operating facilities, and a test burn to ensure that the actual efficiency of the process is at least as high as the efficiency assumed in the Part B application and Risk Assessment. The test burn would also be used to verify emissions and determine operating parameters for the facility.

Until EPA issues a final rule on carbon regeneration units, if we determine that the carbon regeneration unit is conditionally exempt under RCRA, and that the hoppers (discussed in Comment #2 below) are not used for storage, then the Westates facility would only be subject to 40 CFR Part 261.6(c)(2), which requires notification under Section 3010 of RCRA (obtaining an EPA ID number) and 40 CFR Parts 265.71 and 265.72 (regarding the use of the manifest and manifest discrepancies).

2. The DEA states that the facility is designed to eliminate handling practices which would meet regulatory definition of hazardous waste storage. It appears in Figure 2.A.2-1 that the hoppers labeled T-1 and H-1 are used for conveyance of the spent carbon, not storage. In order for the hoppers to remain tied to the operation of the recycling facility, the hoppers could not store any spent carbon when the reactivation furnace was not operating.

3. The FEA should include a more detailed description of how the emission estimates were calculated and compare them to actual emissions data from a similar operating facility.

Air Quality

The DEA does not provide adequate information for EPA to determine at this time whether Federal Prevention of Significant Degradation (PSD) regulations would apply to the proposed facility. Westates should contact Matt Haber, Chief, New Sources Section, EPA Region 9, to request a formal determination of the applicability of PSD regulations to the proposed facility. We understand that Westates has assured the Colorado River Indian Tribes that, if the facility is not subject to Federal permit review, it would comply with all State of Arizona air quality standards, regardless of whether the State has jurisdiction on Federal land. We suggest that, if EPA determines that Federal regulations do not apply, the Bureau of Indian Affairs coordinate with the Arizona Department of Environmental Quality to ensure protection of air quality.

Water Quality

1. According to the DEA, material "spills" could contaminate groundwater beneath the proposed project site during construction and operation if mitigation measures were not implemented and maintained. The FEA should identify all potential contaminant sources during construction and operation and all proposed controls to prevent accidental spills or other hazardous materials releases.

2. During construction, control measures should be implemented to prevent erosion and runoff of soils to surface water channels. Following construction, the site should be revegetated or otherwise restabilized to prevent future erosion of the disturbed soils.

3. According to the DEA (page 4-18), environmental audits would be conducted at regular and unannounced times to ensure proper mitigation measures are followed and that the Emergency Response Plan is up to date. The FEA should identify who would perform these audits.

4. Mitigation measures for ensuring compliance with the pretreatment standards for the Colorado River Sewage System Joint Venture (CRSSJV) are provided on pages 4-20 and 4-21 of the FEA. It is our understanding that evaporation ponds and detention ponds would not be constructed at the proposed project site and that effluent from the carbon regeneration facility would be blended with other CRSSJV influent to meet the wastewater treatment facility's National Pollutant Discharge Elimination System permit.

Wildlife

The FEA should discuss whether the Mohave Fringe-toed lizard also derives benefits from the cactus plain area outside the nearby dune ecosystem, which could be adversely affected by development of the 10-acre parcel for the proposed project. Further, the FEA should address potential foreseeable cumulative impacts of future development in the industrial park on the lizard.

Noise

Under worst case conditions, construction noise levels could be as high as 89 dBA at a distance of 50 feet from the noise source. The FEA should identify what noise levels would be expected, under these conditions, at the Bureau of Land Management office across the road from the proposed project site. Is it expected that office workers would be affected? How could construction noise be mitigated?



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103

OCT 18 1990

In Reply
Refer to: H-3-3

Robert J. Babbitt
Project Manager
Westates Carbon, Inc.
2130 Leo Avenue
Los Angeles, CA 90040-1634

Dear Mr. Babbitt:

We have received your letter dated September 14, 1990, requesting a regulatory determination on a proposed carbon regeneration facility to be located in Parker, Arizona.

After consulting with EPA headquarters, we have determined that, at this time, carbon regeneration facilities without storage are not subject to the hazardous waste treatment and permitting regulations contained in 40 CFR Parts 264 and 270. However, carbon regeneration facilities are currently subject to all regulations for facilities handling recyclable materials (40 CFR 261.6), including notification and manifest requirements. You should file EPA Form 8700-12 (01-90) "Notification of Regulated Waste Activity" to obtain a federal identification number.

As you know EPA intends to regulate carbon regeneration facilities under 40 CFR Part 264, Subpart X; 40 CFR 265, Subpart P; and 40 CFR Part 270 (proposed April 27, 1990 at 55 FR page 17862-17921). When these regulations are promulgated carbon regeneration units will be required to submit "Part B" applications and obtain a RCRA permit.

We hope this information will be useful to you. If you have any questions, please call Jim Bergkamp of my staff at 744-2056.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Feeley", is written over the typed name.

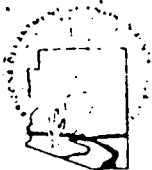
Michael Feeley, Chief
Permits and Solid Waste Branch

cc: Al Roesler, AZDEQ



APPENDIX D





ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Rose Mofford, Governor
Randolph Wood, Director

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 20, 1989

Robert J. Babbitt, Project Manager
Westates Carbon, Inc.
2130 Leo Avenue
Los Angeles, California 90040

RE: Installation Permit No. 65025 for Reactivation furnace,
OFF-gas oxidizer, Venturi-quench scrubber, Impingement scrubber,
ID fan, and Exhaust stack

Dear Mr. Babbitt:

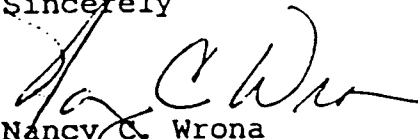
Enclosed is an installation permit for the referenced facility. Also enclosed is your receipt for the fee for this permit. In accordance with Arizona Revised Statutes, §49-430, this permit should be readily available at all times on the operating premises.

Please be aware that any changes in plans, specifications, or field construction may affect your permit status. The Office of Air Quality must be notified of any proposed changes before you may proceed with implementation of any such changes as they may require that an amendment be made to this permit.

This installation permit does not allow you to operate your equipment. To operate, you will need an operating permit (A.A.C. R18-2-306) and enclosed accordingly are instructions and operating permit applications.

If you have any questions, please do not hesitate to contact the Permits Unit of the Office of Air Quality at (602) 257-2285.

Sincerely


Nancy C. Wrona
Assistant Director
Office of Air Quality

NCW:mc

Enclosures

The Department of Environmental Quality is An Equal Opportunity Affirmative Action Employer

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF AIR QUALITY
2005 North Central Avenue ■ Phoenix, AZ 85004 ■ Phone (602) 257-2285

INSTALLATION PERMIT

(As required by Section 49-426, Arizona Revised Statutes)

1. PERMIT TO BE ISSUED TO (Business License Name of Organization that is to receive permit) _____

Westates Carbon, Inc.

2. NAME (OR NAMES) OF OWNER OR PRINCIPALS DOING BUSINESS AS THE ABOVE ORGANIZATION _____

Dr. Allan Sass, President

3. MAILING ADDRESS 2130 Leo Avenue
NUMBER STREET

Los Angeles
CITY OR COMMUNITY

California
STATE

90040
ZIP CODE

4. EQUIPMENT LOCATION ADDRESS Mohave County Airport Industrial Park - parcel IX-A
NUMBER STREET

Kingman
CITY OR COMMUNITY

Arizona
STATE

ZIP CODE

5. FACILITIES OR EQUIPMENT DESCRIPTION _____

Reactivated furnace

OFF-gas oxidizer

Venturi -quench scrubber

Impingement scrubber

6. THIS PERMIT ISSUED SUBJECT TO THE FOLLOWING SEE ATTACHMENT "A"

7. ADEQ PERMIT NUMBER 65025 PERMIT CLASS _____

ISSUED THIS 20th DAY OF April, 19 89


SIGNATURE

Assistant Director
TITLE

The issuance of this permit shall in no way be construed as a warranty affirmation or indication that the equipment described herein will qualify for an operating permit. It is the sole responsibility of the applicant to comply with all applicable air pollution laws, regulations and standards.

WESTATES CARBON, INC.

Beneficial Recycling of Granular Activated Carbon

ATTACHMENT "A"

Installation Permit Conditions for Permit #65025

1. Issuance of this permit shall not absolve the applicant from the requirement to operate this plant in a manner which complies with any other applicable statutes, rules and regulations of the governing federal, state, and local agencies.
2. All provisions of A.A.C. R18-2-504 shall apply to the installation for non-storage hazardous waste recycle plant except no emissions shall be greater than 10% opacity and particulate emissions rate shall not exceed 0.08 gr/dscf.
3. Chlorinated organic compounds (HCl) shall be controlled by use of an off-gas scrubber system with a rated efficiency no lower than 99%. A performance test shall be performed within 180 days of start-up. A test plan shall be submitted to ADEQ for approval at least 30 days in advance of the test.
4. Particulates captured in the control facilities shall be handled and disposed in a manner which prevents re-entrainment into the atmosphere.
5. The off-gas scrubber system at the hazardous waste recycle plant shall be made stack testable in accordance with Arizona Testing Manual (ATM), Method 1, and shall be stack tested within 180 days of start-up. The outlet particulate emission rate shall not exceed 0.08 gr/dscf. The test method used shall be Method 5. Method 3 shall be used to determine the gas analysis. A performance test plan shall be submitted to ADEQ for approval at least 30 days in advance of the test.
6. The off-gas scrubber system must be monitored for pressure drop and ph. The monitoring device for the continuous measurement of the change in pressure of the gas stream through the scrubber must be certified to be accurate within $\pm 5\%$. All monitoring devices shall be calibrated quarterly. The pressure drop, ph concentration, and flow rate shall be recorded weekly and the record shall be available for ADEQ inspection upon request.
7. On and after the date on which the performance tests are completed, the permittee shall not cause to be discharged into the atmosphere, from the non-storage hazardous waste recycle plant any emissions greater than 10% opacity.
8. The permittee shall provide information concerning exhaust emission rate and laboratory analysis of reactivated carbons and quarterly submit summarized data to the Office of Air Quality by the 15th day of the month following each quarter.

9. The proposed reactivation facility shall not process more than 1,200 lbs/hr of spent GAC without prior approval from the Director of DEQ.

10. The source shall not violate requirements of material handling described in A.A.C. R18-2-406 and storage pile per A.A.C. R18-2-407.

11. Any solid waste material and dust generated prior to activation shall be returned to the recycle system and become a finished product. No solid waste discharges will be permitted from the proposed facility.

12. The permittee shall meet all the criteria of a non-storage hazardous waste material facility, according to EPA regulations.

13. A detailed schedule, indicating major construction events with the dates of beginning and completion shall be submitted to the Office of Air Quality by the beginning of construction. A quarterly construction progress report shall be submitted to this office by the 15th day of the month following each quarter.

14. In accordance with A.A.C. R18-2-301(Q), the Director of ADEQ may cancel an installation permit if the proposed construction is not begun within 18 months of issuance or if during the construction, work is suspended for more than 18 months.



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

ROSE MOFFORD, GOVERNOR
RANDOLPH WOOD, DIRECTOR

September 12, 1989

Mr. Elliott Booth
Vice Chairman
Colorado River Indian Tribes
P.O. Box 23-B
Parker, Arizona 85344

Dear Vice Chairman Booth,

I understand that the Colorado River Indian Tribes are concerned about environmental issues pertaining to Westates Carbon Inc., a company wishing to locate operations in the Tribe's industrial park near Parker, Arizona.

The Arizona Department of Environmental Quality (ADEQ) had issued an air quality installation permit to Westates Carbon, Inc. for the Mohave County Airport Industrial Park, Kingman, Arizona. The ADEQ air quality permit was issued on April 20, 1989. ADEQ would not have issued the permit had this company presented any potential threat to the health and welfare and the quality of the environment in the Kingman area. Moreover, ADEQ's air quality personnel tell me that the Colorado River Indian Tribe's location in the Parker, Arizona, area would not change Westates' ability to obtain the same or similar permit. This also would not change the fact that the company's air pollution emissions are expected to be very minor. Of course, these conclusions are based on the specific facility design and operation proposed to be permitted.

ADEQ also made a cursory examination of Westates Carbon, Inc.'s handling and management of hazardous and non-hazardous substances and wastes, as well as groundwater quality permit needs. ADEQ's examination found that Westates' plan for handling hazardous and other substances at the Kingman location was reasonable and would exempt them from the Resource Conservation and Recovery Act (RCRA) hazardous waste permitting requirements. Permits may be needed in the future if Westates Carbon, Inc.'s operations change to storing hazardous wastes that were generated by an off-site facility. In addition, the Company's planned operation appeared to be exempt from groundwater permit requirements. No permits would be needed as long as the operation discharges all wastewater to an approved wastewater treatment plant or other disposal facility off-site; has no necessity to construct ponds, sumps or dry wells; and has no underground storage of hazardous and non-hazardous substances or wastes.

The Department of Environmental Quality is an Equal Opportunity Affirmative Action Employer.

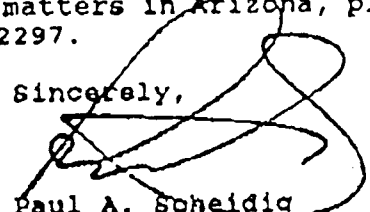
Vice Chairman Booth
September 7, 1989
Page 2

As I stated in a previous letter to Mr. Billy Taylor on July 14, 1989, Westates Carbon, Inc. appeared to ADEQ as a well managed and planned operation that could properly safeguard the environmental condition of the proposed Kingman, Arizona, area. There is no reason to believe that the company would present a different picture for an operation located on the Colorado River Indian Tribe's lands.

I also understand that the Tribe would like to have ADEQ issue and enforce the necessary air quality permits needed by Westates Carbon Inc. There are several options open to the Tribe in this regard and each has its pros and cons. The most expedient option for the Tribe, which would allow the Tribe to maintain its sovereign independence, is to hire its own expert air quality consultant to issue and administer permits. The consultant's costs could be charged back to the company being permitted. The second option is to request that ADEQ issue and administer the necessary permits under authorities provided in Arizona Revised Statutes, Article 6, Title 49, Section 561 Jurisdiction over Indian Lands. And lastly, the third option is to develop and enter into an Intergovernmental Agreement (IGA) between ADEQ and the Tribe to have ADEQ enforce tribal air quality rules and standards, which would have to be the same as rules and standards for Arizona. The Fort Mohave Indian Tribe has IGAs in place that are similar in concept but related to wastewater and fish and game rules. As with the first option the costs incurred by ADEQ under the last two options would have to be born by the Tribe or permitted company. ADEQ certainly is willing to discuss each of these options further with the Tribe. Please contact Ms. Nancy Wrona, Assistant Director Air Quality Programs for ADEQ at (602) 257-2308 if you are interested in pursuing the last two options.

If you have any further questions pertaining to Westates Carbon, Inc.'s environmental regulatory matters in Arizona, please do not hesitate to call me at (602) 257-2297.

Sincerely,


Paul A. Scheidig
Ombudsman

cc:

Nancy Wrona, ADEQ
Ron Miller, ADEQ
Norm Weiss, ADEQ
Mr. Billy Taylor

END

APPENDIX E





UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

ECOLOGICAL SERVICES
3616 W. Thomas, Suite 6
Phoenix, Arizona 85019

2-21-90-I-100

March 1, 1990

William E. Curry
Staff Hydrogeologist
Engineering Enterprises, Incorporated
1225 W. Main
Norman, Oklahoma 73069

Dear Mr. Curry:

This responds to your letter dated February 6, 1990, requesting a list of species federally listed or proposed to be listed as threatened or endangered. The proposal action involves the construction of a carbon recycling plant. Your geographic area of interest is in La Paz County, Arizona.

Our data indicate no listed species would be affected by the proposed action.

If we can be of further assistance, please contact our office (Telephone: 602/379-4720).

Sincerely,

Gilbert D. Metz
Acting Field Supervisor

cc: Regional Director, Fish and Wildlife Service, Albuquerque, New Mexico
(FWE/HC)
Director, Arizona Game and Fish Department, Phoenix, Arizona

APPENDIX F



GAME & FISH DEPARTMENT

2222 West Greenway Road, Phoenix, Arizona 85023 (602) 942-3000

Governor
Rosa MaffordCommissioners:
Francis W. Werner, Tucson, Chair
Thomas G. Woods, Jr., Phoenix
Phillip W. Ashcroft, Elgin
Gordon K. Whiting, Glendale
Larry Taylor, YumaDirector
Duane L. Shreve
Deputy Director
Thomas W. Spalding

March 8, 1990

Mr. William E. Curry
Staff Hydrogeologist
Engineering Enterprises, Inc.
1225 West Main
Norman, Oklahoma 73069

Dear Mr. Curry:

Re: Carbon Recycling Plant near Parker, Arizona

The Arizona Game and Fish Department has reviewed your letter of February 6, 1990 requesting information to complete an environmental assessment for a carbon recycling plant near Parker, Arizona, and the following comments are provided.

We do not anticipate significant adverse impacts to wildlife resources from the development of the site itself. We are, however, concerned about the nature of the operation of the plant and the potential for off-site impacts from the waste products generated in the recycling process. Our specific concerns include the maintenance and monitoring of air and water quality standards. We understand that these concerns will be addressed in the environmental assessment currently being prepared for this project.

While the plant location is essentially "in-town", the unique habitats associated with the Cactus Plains dunes ecosystem begin a short distance to the east. The dunes provide habitat for the Mohave fringe-toed lizard (Uma scoparia), a candidate species on the Arizona Threatened Native Wildlife list. This lizard is primarily threatened by loss of habitat.

We appreciate the opportunity to review this proposal during the development of the environmental assessment. If you need any additional information, please contact Bill Werner, Yuma Regional Habitat Specialist, at (602) 344-3436.

Sincerely,

A handwritten signature in cursive script that reads "David L. Walker".

David L. Walker
Habitat Evaluation Coordinator
Habitat Branch

DW:WEW:jj

cc: Larry Voyles, Supervisor, Yuma Regional Office

An Equal Opportunity Agency



800 W. WASHINGTON
SUITE 415
PHOENIX, ARIZONA 85007
TELEPHONE 602-542-4174

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M. JEAN HASSELL
STATE LAND COMMISSIONER

KENNETH E. TRAVOUS
EXECUTIVE DIRECTOR

COURTLAND NELSON
DEPUTY DIRECTOR

November 29, 1990

**Wilson Barber, Area Director
DOI Bureau of Indian Affairs
Phoenix Area Office
P.O. Box 10
Phoenix, AZ 85001**

ATTN: C. Randall Morrison

**RE: Colorado River Indian Reservation, Westates Carbon Regeneration Lease,
DOI-BIA/PAO**

Dear Mr. Barber:

Thank you for notifying us about the above project and sending us a copy of the cultural resources documentation prepared by Weldon Johnson from the CRIT Museum. I have reviewed the documentation that you submitted and have the following comments pursuant to 36 CFR Part 800:

1. The documentation that was submitted is not consistent with the Secretary of the Interior's standards for archaeological inventories and we request that future surveys be more consistent with these standards and presented to us in a format per our memorandum of February 5, 1988 to all Federal agencies and consulting archaeologists.
2. Regardless, we have no reasons to doubt Mr. Johnson's findings and note that he did not locate any cultural material.
3. Therefore, we concur with the agency that this project should have no effect on any National Register or eligible properties.
4. One conditional comment is that should archaeological remains be encountered during project ground disturbing activities, work should cease in the area of the discovery and this office be notified immediately, pursuant to 36 CFR 800.11.

We appreciate your continued cooperation with this office in complying with the historic preservation requirements for federally assisted undertakings. If you have any questions, please contact me.

Sincerely,

Robert E. Gasser
Compliance Coordinator

for Shereen Lerner, Ph.D.
State Historic Preservation Officer



RECEIVED
BUREAU OF FINANCIAL INVESTIGATIONS
DEC 11 12 56 PM '90
PHOTOGRAPHIC SECTION

RECEIVED

89-8-1

RECEIVED: 08-03-89

REVIEWED: 08-08-89

C.R.I.T. MUSEUM
ARCHAEOLOGIC WALK-OVER PRE-APP. FORM

PROPOSAL: Westates Carbon

TWP: 9N R: 20W SEC: 7

LOCATION: Industrial Park

S/W 1/4 OF S/E 1/4

SUBMITTED BY: Weldon B. Johnson, Sr., Asst. Mus. Dir./Cult. Arch.
THROUGH: Curtiss Martin, Sr., Museum Director

PREVIOUS DESIGNATIONS: A records search of the C.R.I.T. Museum's archaeological files revealed no sites previously recorded at this location.

SITE DESCRIPTION: Site consists of compacted blow sand with creosote, sage and some cholla cactus, ORV impacts also occur at this location.

WALK-OVERS RESULTS: The archaeological walk-over revealed no sites identified.

RECOMMENDATIONS/REMARKS: Due to the absence of cultural material and no sites previously recorded, I recommend waiver of the Cultural Resource portion within the C.R.I.T. L.U.O. 85-2 as amended.

ATTACHMENTS:

APPENDIX H

NOV 30 1990

*Colorado River
Sewage System
Joint Venture*

Post Office Box 628
Parker, Arizona 85344
(602) 669-9821

November 5, 1990

Robert A. Shapiro, PhD
Simon EEI, Inc.
1225 West Main
Norman, OK. 73069

Dear Dr. Shapiro:

Please be advised, that this office and our consulting engineers, have made a preliminary review of the plans of WESTATES CARBON to discharge certain industrial wastes into the sewer system managed by THE COLORADO RIVER SEWAGE SYSTEM JOINT VENTURE. We anticipate we will be able to accommodate this flow without significant impact on our system.

The Joint Ventures current operating flow is approximately 75% of it's maximum flow capacity of 800,000 gallons per day. Therefore, the expected 18,700 gallons per day (13 gpm) incremental flow increase contributed by the WESTATES CARBON facility will be less than 3% of our capacity. At this level, the waste stream flow will not have a significant impact on our system.

Westates Carbon has been notified by our office that as an industrial user of the system that they will be required to obtain an "Industrial Wastewater Discharge Permit" prior to being allowed to discharge into the Sewer System. This permit will control the mechanical design of their tie-in into the main sewer line. This permit also states that:

1. No person shall discharge or cause the discharge any waste water which may have an adverse harmful effect on the Joint Venture Sewage Treatment Plant.
2. Users shall provide necessary waste water pretreatment as required to comply with this resolution and shall achieve compliance with all Federal Categorical Pretreatment Standards.

Westates Carbon is aware of the conditions under which the "Industrial Wastewater Discharge permit" is issued and is aware of the two conditions previously stated above.

The Joint Venture has adequate monitoring and enforcement control to assure that the Westates plant will discharge wastewater into the Sewage System in accordance with the system's standards and operating conditions.

Page Two

We hope this information will be helpful to you in your assessment. If you have any questions concerning this matter please contact the Joint Venture office at (602-669-9821).

Sincerely,

Robert C. Garcia

Robert C. Garcia
General Manager

RCG/raa

cc: Conner Byestewa, C.R.I.T., E.P.A.
Board of Directors
Daniel Eddy Jr., Chairman C.R.I.T.
Jeff Nolte, I.H.S.

APPENDIX I



Parker Pioneer

25

Rodeo set Oct

b
class for Arizona Western College, Van A. Hurst, and other students volunteered to scrub
to prepare for the 11th Annual Special Olympics Swimming, Diving and Volleyball Cham-
in Parker over the weekend. Course instructor said it was also good practice for breathing

Oct 4, 1989

Photo: Hal Collette

In between the bronc' busting, bull riding, steer wrestling and barrel racing at the 40th Annual Parker Rodeo to be held Oct. 14 and 15, the youngest of wranglers will saddle up for an event that will be sponsored by the La Paz County Sheriff's Posse and the La Paz County Rodeo Queen Committee.

Cowboys and cowgirls age six and under will race their sturdy mounts through the 20-foot barrel course at the Western Park arena in two runs scheduled for Saturday and Sunday performances.

Awards will be presented to the boys or girls who run the fastest time through the cloverleaf pattern on their custom "fast" stickhorses. No entry fee is required for this special event but entries will be

Recycling company seeks Parker site

By JIM TIFFIN

PARKER - A company that recycles activated carbon is negotiating with the Colorado River Indian Tribes about expanding their operations into the tribes' industrial park next to Saguaro Chevrolet...

Bob Babbitt, project manager for Westate Inc., a Long Beach, Calif., firm says that after looking at Kingman, and deciding to look elsewhere in western Arizona, Parker was chosen.

"The residents of Kingman and that area philosophically are trying to establish a no growth, non-industrial area," says Babbitt.

Westate cleans and recycles activated carbon which is used to soak up spills of fuels such as gasoline, diesel and oil. "We help clean up the environment," says Babbitt.

Small chunks of activated carbon are layered over the ground at a spill site. The carbon then soaks up the spilled fuel from the ground and holds it in a tight bond until cleaned and purified in a plant, which Westate would like to place in Parker, says Babbitt.

"Our negotiations with the tribes are very favorable," he says. "There are a lot of issues to cover, but we're positive that it will be worked out."

Babbitt said the company is environmentally conscious and that no air or chemical pollutants are created and released into the air, land or water.

Rodeo Queen contest to be held Friday

To kick off Western Week, the Rodeo Queen Committee has scheduled the rodeo queen equestrian contest on Oct. 6 at 7 p.m. at Western Park.

During intermission, the first run of the Stickhorse Competition will

take place.

The public is invited to attend and support both activities.

On Oct. 7 at Western Park the Queen Committee will again sponsor its annual barbecue and dance

See QUEEN, Page 2



Homecoming Court selected

Parker High School Homecoming King during Homecoming activities at the high school. The king was announced at halftime that night during the Homecoming activities. Selected as candidates for King and Queen were Crawford, Nicole O'Neill, Chad Berg, L. Sandra Cook, Francisco Cardenas, Niki and Tonya Smith.

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